

**OUTLINE FOR  
REVISED/NEW SAFETY AND SECURITY POLICIES  
AS APPROVED 12/19/2016**

**Executive Summary and Overview**

**PURPOSE:** To establish revised safety and security policies following the receipt of MCH Consulting Inc's report (the "Report:") of a security inspection conducted July 22-25, 2016.

**Addenda 1 and 2**, following this summary, address, respectively, (1) the authority given to the SIPOA board of Directors by the SIPOA Covenants and Bylaws to establish and enforce security policies, and (2) definitions used in this summary and the Addenda.

**AREAS OF UPDATE/CHANGE/ADDITION:**

- SSF Mission Statement and Implementation Instructions (**Addendum 3**)
- Customer Service/Customer Relations/Personal Services/Communications (**Addendum 4**)
- Access Control (**Addendum 5**)
- Enforcement Procedures (**Addendum 6**)
- Physical Plant/SSF Facilities/Vehicles (**Addendum 7**)

(Please note that each of Addenda 3-7 is intended to be a free-standing document, and necessarily incorporate the information contained in Addenda 1 and 2)

**Executive Summary**

Overall, the Report identified (a) some areas of clear deficiency; (b) other areas where the lack of a consistent message in defining the Security Force's duties and limitations has created a mis-match of expectations between the SIPOA Community and the Security Force Staff (i.e., "Customer Service/Customer Relations" issues); and (c) areas in which no policies currently exist but are needed.

**Addendum 3: SSF Mission Statement and Implementation Instructions**

There is currently no unifying mission statement for the SSF that sets out SIPOA's expectations and goals. To set and define the limits of expectations for the benefit of both the SSF and the SI Community, a unifying mission statement is necessary. The Mission Statement also incorporates a set of Implementation Instructions to expressly address the Security Force side of the "Customer Service/Customer Relations" issue identified by the Report.

**Addendum 4: Customer Service/Customer Relations/Personal Services Communications**

1. The SSF Mission Statement and Implementation Instructions (Addendum 3) establish the framework for education of the Security Force concerning its duties and function.
2. However, the nature, scope of mission and other relationships between the SSF and the SIPOA Community have evolved over the years, particularly as the SSF as a functioning

unit has transitioned from being composed of SIPOA employees, to an outsourced contractor.

3. Therefore, *a new communication from SIPOA to the SI Community must also occur* as a companion piece to the newly developed SSF Mission Statement and Implementation Instructions, to educate and establish within the Community reasonable expectations about
  - a. what to expect from the Security Force; and
  - b. the obligations of the members of the SI Community as they relate to the operations of the Security Force.
4. The objectives of these two sets of communications are to
  - a. eliminate misconceptions and expectations that have grown up over the years, and
  - b. establish a proper and unified framework for relationships between the SSF and the SI Community going forward.
5. Recurring challenges relating to the interactions between the SSF and the SI Community result when Property Owners, Guests, Contractors and others seek to avoid or ignore the Rules and Regulations, or claim special privilege or exceptions from the Rules and Regulations. Such actions create unnecessary tensions and ultimately result in increased friction within the SI community and with the SSF. It is therefore not only desirable but necessary that everyone have a common understanding about what is and is not acceptable behavior within the Seabrook Island Community.
6. Just as the SI Community has a reasonable expectation that the SSF will perform according to the Rules and Regulations and its Mission Statement, SIPOA and the SSF have a reasonable expectation that Property Owners and others who have a stake in the well-being and security of the Community will not take advantage of their status and seek concessions that are against the Rules and Regulations or engage in other avoidance measures.
7. Re-publication of the communications to the SI Community contained in Addendum 4 should be accomplished through
  - a. Tidelines;
  - b. the SIPOA Website;
  - c. SIPOA “Get the Scoop” sessions;
  - d. the Rules and Regulations;
  - e. rental packages given to visitors;
  - f. as Security Force shift handouts to visitors, invitees or contractors as they enter the SID and obtain access to the SID;
  - g. as “pick-up” literature at the Lake House, and (viii) through periodic education and information sessions.

#### **Addendum 5: Access Control**

1. One of SIPOA’s primary undertakings relating to safety and security within the SID is access control for vehicles and individuals.
2. Access Control is important to ensure that the members of the SI Community who must pay for the maintenance and upkeep of the roads, beaches, amenities and other

facilities are not funding those who have no legitimate business or other good reason to be in the SID.

3. “Positive” access control means not only allowing only those who have proper permission to enter the SID efficiently, but also establishing who the admitted persons are, to facilitate identification of those who violate safety and security policies so that enforcement actions can be properly directed to the responsible parties should they violate the rules and regulations.
4. Access Control may also include exercising control as to individuals who are properly admitted to the SID for one purpose or location but who then seek to make use of other facilities to which they are not entitled.
5. Maintaining “positive” access control, therefore, involves the collection of some level of personal information for at least a limited period on persons who are not property owners, but who are otherwise properly admitted to the SID.

**Addendum 6: Enforcement Procedures** describes the traffic control measures used by the SSF to stop or prevent violations of the Rules and Regulations once a vehicle or person enters the SID and to act against those who violate the rules and regulations. As Enforcement Procedures relate to SIPOA, they include, but are not necessarily limited to, the following:

1. **“Traffic stops”** are most often those encounters that occur when an SSF officer in a patrol vehicle observes an alleged moving violation of a rule or regulation (e.g. speeding, passing bicyclists in an island). Traffic stops can be potentially dangerous encounters because of the nature of moving vehicles, because of unknowns relating to the occupants of the allegedly offending vehicles, and because of the possibility of escalation of a potentially dangerous situation if an offending vehicle attempts to flee. SSF Officers may make traffic stops when they are performing radar speed control operations using hand-held or vehicle mounted speed detection equipment and when in their professional judgment the potential for danger is minimal.
2. **“Pursuit”** is the attempt to overtake and then stop a vehicle whose occupants have committed an alleged violation of the rules and regulations. Because pursuit by its very nature implies the escalation of speed, and because it may incite allegedly offending individuals to attempt to flee and drive more recklessly, pursuit by the SSF of individuals in vehicles who appear to be violating rules and regulations while within the SID, or of individuals who are attempting to exit from the SID after committing violations of rules and regulations on the SID, will only be employed under the following circumstances
  - a. In making an authorized traffic stop, and limited to a distance not to exceed ½ mile from the site of the infraction or a pursuit speed more than 40 miles per hour (whichever occurs first), after which pursuit will be discontinued if unsuccessful; or
  - b. As a last resort when the personal safety of SID Community members is in jeopardy.
  - c. If pursuit is terminated or unsuccessful, the SSF Officer will report the fleeing vehicle information to the Gateway, so that appropriate measures can be taken to further identify the fleeing vehicle if it attempts to leave the SID.

3. “Issuing citations” is the process of formally informing, in writing, an individual who has allegedly violated rules and regulations of the initiation of a formal process that memorializes the alleged infraction and indicates that a monetary or other sanction may be forthcoming.
4. “Parking Control” describes the actions taken by the SSF to ensure that parking rules and regulations are monitored and that violators are identified.
  - a. Parking Control applies to all areas of the Seabrook Island Community Property, and expressly includes parking of all types of vehicles (including commercial vehicles, RVs and large trucks) and/or towed loads (e.g. boats and trailers).
  - b. Parking Control applies not only to common roadways and parking areas (e.g., Lake House or beach access), but also to other open spaces within the Seabrook Island Community Property and may include regime/association parking lots and the parking lots at the Community Center if the regime or association has granted permission for the SSF to operate within their property.
5. “Flow Control” of traffic at the SID entrance Gateway is directed to keeping the flow of traffic of all types moving efficiently through the entry to the SID without sacrificing security and access control.

#### **Addendum 7: Physical Plant/Security Force Facilities and Vehicles**

1. Certain physical plant facilities, particularly the Gateway entry Gatehouse and associated parking lot and holding area, are occupied by SSF Security Officers on an around-the-clock, daily basis.
2. These facilities are the first impression that everyone has of the SID as well as the SSF. It is therefore important that these facilities always be kept in a professional state both as to appearance, cleanliness and organization, with all systems in good operating condition.
3. It is the responsibility of the SSF to ensure that
  - a. The physical facilities and their surroundings are in good order, kept neatly, and present a fresh and professional appearance to those observing the area from outside or entering the area; and
  - b. All systems are in good operating condition, or that a work order or report has been made pertaining to any malfunctioning system and dispatched in a timely manner to the appropriate person as designated in the SSF contract.
4. The SSF also has for its use vehicles that bear the SIPOA name and logo. It is the SSF’s responsibility to ensure *on each shift* that the following conditions are satisfied:
  - a. The vehicles are in good operating condition with all lights, emergency equipment, communications equipment and safety equipment functioning properly;
  - b. The vehicles are operated in a safe, courteous and proper manner;
  - c. Any malfunctioning equipment or unsafe condition with the vehicles is reported immediately to the appropriate person as designated in the Vendor contract, and that the vehicle is not operated if it is unsafe or if all equipment is not working properly;

- d. Only individuals who have valid motor vehicle operating licenses sufficient to operate a specific vehicle are operating security vehicles.
  - e. The vehicles are operated only for official SIPOA/SSF business.
5. Except as authorized by the SIPOA Executive Director, Individuals who are not SSF Security Officers shall not operate Security Force vehicles or ride in those vehicles, with the following exceptions:
- a. Security Force supervisors may operate or ride in the vehicles as their duties or necessity dictate.
  - b. Individuals who are servicing or otherwise authorized may operate the vehicles for purposes of maintenance.
6. Property owners and members of the SI Community who are not associated with the SSF or SIPOA operations are not authorized to ride in SSF Vehicles unless the SSF driver has communicated with the Shift Supervisor and, in the exercise of his/her professional judgment, the SSF Officer operating the vehicle determines that the transportation is appropriate because of an emergency or other matter of urgent necessity, and when other alternatives do not reasonably exist.

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## **ADDENDUM 1**

# **AUTHORITY FROM THE SIPOA PROTECTIVE COVENANTS AND THE BYLAWS FOR SIPOA TO ESTABLISH A SECURITY FORCE AND TO PROMULGATE AND ENFORCE RULES AND REGULATIONS GOVERNING SECURITY AND SAFETY ON THE SEABROOK ISLAND DEVELOPMENT**

APPROVED 12/19/16

## ADDENDUM 1

### **AUTHORITY FROM THE SIPOA PROTECTIVE COVENANTS AND THE BYLAWS FOR SIPOA TO ESTABLISH A SECURITY FORCE AND TO PROMULGATE AND ENFORCE RULES AND REGULATIONS GOVERNING SECURITY AND SAFETY ON THE SEABROOK ISLAND DEVELOPMENT**

- Definitions from Page 2 of the Protective Covenants: “SID”

*SID*: means the Seabrook Island Development, a private development contemplated by and accomplished pursuant to the Amended Planned Unit Development (PUD) previously approved by the County of Charleston, South Carolina and subsequently by the Town Council of the Town of Seabrook Island on November 12, 1987, as the same may be amended from time to time as well as any other Property made a part of the SID in the manner provided in the Bylaws and made subject to these Protective Covenants.

The SID is a private entity with access thereto on a controlled and limited basis through a private SIPOA owned and operated gate. All roads and automotive vehicle ways and associated rights-of-way are owned by or, upon completion in accordance with the requirements of SIPOA, are to be deeded to SIPOA. No obstruction, except the gate at the entrance to the SID, shall be permitted or maintained which prevents the free use of said streets by Property Owners, their Guests, or others as set forth in the deeds of conveyance of the Company to SIOC, recorded with the R.M.C. Office in Charleston County, Charleston, South Carolina.

- Article 2 of the Protective Covenants (“Covenants”) contains elements that are relevant to a Security Services Mission Statement
  - “The purpose and business of SIPOA is to preserve the Property values and the quality of life on the [Seabrook Island Development] SID through”
  - “Development and implementation of programs to...provide for the health, safety, security and welfare of Property Owners”
  - “Protection...of...roads, bridges, parks, playgrounds, beaches, open spaces, rights of way, easements, and other SIPOA properties....”
  - “Retention of security forces and implementation and enforcement of security measures to limit access to the SID to Property Owners, and...to Property Owner family members, Guests and others.”
  - “Adoption, distribution and enforcement of rules and regulations for the common good of Property Owners, including but not limited to rules and regulations pertaining to: ... (iv) use of SIPOA properties; (v) responsibilities and obligations of Property Owners and others authorized to access the SID or to use the facilities and properties owned and/or operated by SIPOA; (vi) security, safety and maintenance of good order; and (vii) imposition of monetary and other sanctions for violations thereof.”
- Article 2 of the Bylaws contains similar language tracking the Covenants in the areas cited above.
  - Article 3.2.7 of the Bylaws gives the SIPOA Board of Directors the power “...[t]o adopt, publish and enforce rules and regulations for the common benefit, governing

Property Owners in the SID and others using the facilities and properties owned and/or operated by SIPOA. Such rules and regulations shall be designed to govern personal conduct as it may affect the quality of life in the SID, use of the streets, roads and other common property, as well as administration and enforcement of applicable Protective Covenants and restrictions....”

- Article 3.2.8 of the Bylaws gives the Board of Directors the power “...[t]o impose reasonable sanctions, including monetary sanctions, against Property Owners and others within the SID for violation of the Protective Covenants, these Bylaws or the duly adopted and published rules and regulations. Any monetary sanction shall constitute a lien upon the Property of the violating Property Owner or of the Property Owner whose Family Member, tenant, Guest, invitee or other person has committed such violation, and the Board may also suspend a Property Owner’s right to vote and/or the alleged Property Owner’s family, tenant, Guest or invitee’s right or privilege to use the common properties or services and/or suspend and retrieve all access devices (subject, however, to a Property Owner’s right of access to such Property Owner’s Property.) In the event that any Family Member, tenant, Guest or other invitee of a Property Owner violates the Protective Covenants, Bylaws or the duly adopted and published rules and regulations and an assessment is imposed, the assessment shall first be assessed against such Family Member, tenant, Guest or invitee; provided, however, if SIPOA is unable to readily locate the offender or if the assessment is not paid by the Family Member, tenant, Guest or invitee within the time period set by the Board, the Property Owner shall be personally liable for payment of the assessment upon notice from SIPOA.”
- Article 3.2.8 of the Bylaws (relating to liability of Property Owners for violations of Rules and Regulations by the Property Owner’s family, tenant, Guest or invitee)
  - 3.2.8 **Legal Proceedings.** To commence actions and participate in proceedings in courts of law and before public agencies as needed to protect or advance SIPOA’s purposes. To impose reasonable sanctions, including monetary sanctions, against Property Owners and others within the SID for violation of the Protective Covenants, these Bylaws or the duly adopted and published rules and regulations. Any monetary sanction shall constitute a lien upon the Property of the violating Property Owner or of the Property Owner whose Family Member, tenant, Guest, invitee or other person has committed such violation, and the Board may also suspend a Property Owner’s right to vote and/or the alleged Property Owner’s family, tenant, Guest or invitee’s right or privilege to use the common properties or services and/or suspend and retrieve all access devices (subject, however, to a Property Owner’s right of access to such Property Owner’s Property). In the event that any Family Member, tenant, Guest or other invitee of a Property Owner violates the Protective Covenants, Bylaws or the duly adopted and published rules and regulations and an assessment is imposed, the assessment shall first be assessed against such Family Member, tenant, Guest or invitee; provided, however, if SIPOA is unable to readily locate the offender or if the assessment is not paid by the Family Member, tenant, Guest or invitee within the time period set by the Board, the Property Owner shall be personally liable for payment of the assessment upon notice from SIPOA. The failure of the Board to enforce any provision of the Protective Covenants, Bylaws or the duly adopted and published rules and regulations shall not be deemed a waiver of the right of the Board to do so thereafter.

- Article 7.4.2 of the Bylaws establishes the Safety and Security Committee, which is given the following tasks:
  - “Develop and recommend to the Board rules and regulations for control of Access to the SID, and for the security, protection, safety and welfare of Property Owners and all Individuals within the SID”;
  - “Develop programs, policies and rules and regulations covering security, fire protection, traffic control and enforcement of applicable recorded Protective Covenants as well as [the] Bylaws and duly adopted and published rules and regulations.”
  - “Hear requests for reconsideration in matters within its jurisdiction. “
- Article 8 of the Bylaws provides for Hearings and Appeals through which Individuals may challenge the imposition of sanctions for violations of the Protective Covenants, Bylaws and any and all rules and regulations adopted and published by or through the Board of Directors.
  - Article 8.3 establishes an “Additional Enforcement Right” that gives SIPOA, acting through the Board, and “notwithstanding anything to the contrary herein contained,” the option to “...elect to enforce any Provision of the Protective Covenants, these Bylaws or the duly adopted and published rules and regulations of SIPOA by self-help (specifically including but not limited to the towing of vehicles that are in violation of parking rules and regulations) or by suit at law or in equity to enjoin any violation or to recover monetary damages or both.... In any such action, to the maximum extent possible, the Property Owner, tenant, Guest, invitee or other person responsible for the violation for which relief is sought shall pay all costs, including reasonable attorney’s fees actually incurred.”

**ADDENDUM 2**  
**DEFINITIONS USED IN THIS DOCUMENT**

APPROVED 12/19/2016

## **Definitions**

**Camp St. Christopher:** a private religiously affiliated entity located within the Gateway.

**Rules and Regulations:** those rules and regulations promulgated by the SIPOA Board of Directors pursuant to the authority granted to the Board by the Covenants and Bylaws for the safety, well-being and personal conduct of all individuals when they are working, visiting, living and/or playing on the Seabrook Island Community Property.

**Seabrook Island Club (SIC):** the property owned by the SIC (including golf courses, Beach Club, Tennis Center, Equestrian Center, Island House and adjoining parking lots, and the Pelican's Nest, Arcade and Seabrook Shoppe).

**Seabrook Island Community (SI Community):** The individuals who are permitted to live, work, visit and/or play within the confines of the SI Community Property and subject to SIPOA Rules and Regulations and applicable State and Federal law. The SI Community consists broadly of Seabrook Island property owners, guests, renters, visitors to Camp St. Christopher, contractors performing work on Seabrook Island (including Salt Marsh and Bay Pointe), SIC members (whether they are Seabrook Island property owners or not), employees of SIPOA, the SIC and Camp St. Christopher, and other personal and business invitees.

**Seabrook Island Community Property (SI Community Property):** the area, roads, beaches above the high tide line, and other facilities lying inside the Seabrook Island Gateway, as well as the Bay Pointe and Salt Marsh Communities, other than the property owned by the SIC and Camp St. Christopher and certain private property owned by regimes and associations.

**Seabrook Island Development (SID):** See the official definition contained in the Restrictive Covenants, which is included in Addendum 1. In general, the SID is the area contained within the Seabrook Island Gateway and includes the SI Community Property.

**Seabrook Island Gateway (Gateway):** The entrance gate where the SSF office is located, and which provides the only vehicle access point onto the SI Community Property (other than the entrances to Bay Pointe and Salt Marsh, which are located outside the Gateway)

**SSF Security Officer:** The term used to describe individual members of the SSF. Security Officers employed in the SSF are unarmed, but have special training and certifications, must adhere to the SSF Mission Statement (Addendum 3) and while on duty make patrols, maintain access control, provide customer service, and remain constantly observant.

**Seabrook Island Property Owners Association (SIPOA):** The association of property owners of Seabrook Island which, acting through its Board of Directors and Executive Director, in accordance with the authority granted by the Seabrook Island Protective Covenants and Bylaws, establishes the policies and rules for the governance and security of the SID, as those may be changed and interpreted from time to time, and except for specific responsibilities delegated in the Covenants and Bylaws to the exclusive right of the Property Owners.

**SIPOA Security Force (SSF)**: A vendor-provided, -trained and -equipped force of individuals who will provide access control to the Seabrook Island Community Property and enforce the SIPOA Rules and Regulations that guide and govern the conduct of individuals who are permitted to live, work and play within the Seabrook Island Community, in accordance with the Security Force Mission Statement.

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**ADDENDUM 3  
MISSION STATEMENT  
AND  
IMPLEMENTATION INSTRUCTIONS  
FOR  
SIPOA SECURITY FORCE (SSF)**

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### ADDENDUM 3

#### Mission Statement and Implementation Instructions for SIPOA Security Force (SSF)

The purpose and business of the Seabrook Island Property Association (SIPOA) is to preserve the property values and the quality of life in the Seabrook Island Development (SID) through the development and implementation of programs to protect, specifically, the health, safety, security and welfare of Property Owners, members of the SI Community, and the roads and facilities owned or controlled by SIPOA to carry out its purpose and business.

#### **Mission Statement:**

**It is the Mission of the SIPOA Security Force** to enforce SIPOA's published Rules and Regulations and policies, and to assist in providing for the security and well-being of the members of the SI Community within the SI Community Property

#### **Implementation Instructions**

**In accomplishing the Mission outlined above**, SIPOA SSF Security Officers will perform in accordance with the following criteria:

- At the SIPOA Gateway, controlling access by
  - Authenticating individuals as permitted members of the SI Community who seek access to the SID via vehicle.
  - Validating vehicle identification and permission of vehicles that seek access to the SID.
- Within the SID, maintaining traffic control for all vehicles traveling on the SI Community Property, including but not limited to enforcement of speed limits and violations of the Rules and Regulations that occur within the observation of witnesses or in the presence of SSF members;
- Within the SID, providing in-person contact with persons who report an emergency, a matter of urgent necessity, or a violation of SIPOA Rules and Regulations
- Within the SID, issuing citations for violations of SIPOA Rules and Regulations personally observed or related by first-hand observers during an investigation of an alleged violation.
- At the SIPOA Gateway and within the SID, always presenting a professional appearance and demeanor.
- Ensuring that the physical plant working spaces and vehicles occupied by and assigned to the SSF, reflect a professional pride in place and equipment that are part of the mission.
- Affording courtesy and respect, interest, and composure to every person with whom the Security Officer interacts.
- Performing all tasks and duties professionally and according to established procedures and post orders.
- In responding to requests by a member of the SI Community, SSF Officers will:
  - Make a record of the contact.
  - Assess the need for additional services or implementation of remedial action.
  - Call for additional services as needed.
  - Render assistance within the SSFs post orders and rules;

- In ensuring continuity of coverage within the SID, to engage in a thorough debrief of the oncoming shift of SSF Security Officers at the change of shift, and to record in writing the events of the shift for future reference, ensuring that all documentation of activities occurring during the shift is complete before the current shift is relieved.
- In responding to an emergency or matter of urgent necessity, where procedures are not otherwise expressly authorized:
  - The SSF Security Officer should seek guidance from his or her superior before acting if circumstances permit; or
  - If such guidance is not available, or if, in the SSF Officer's professional judgment, necessity does not allow sufficient time to seek guidance, the SSF Officer should exercise his/her professional judgement in determining the best course of action, taking into consideration what is best for SIPOA as a whole and the needs of the requestor; and
  - Promptly report the action taken to the SSF Officer in charge of the shift, orally and then in writing, and to the SIPOA Executive Director.
- SSF officers shall not be armed and will not have access to weapons.

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**ADDENDUM 4**  
**CUSTOMER RELATIONS/CUSTOMER SERVICE**  
**AND PERSONAL SERVICES COMMUNICATION**  
**TO SIPOA PROPERTY OWNERS AND**  
**TO THE SEABROOK ISLAND COMMUNITY**

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## ADDENDUM 4

### CUSTOMER RELATIONS/CUSTOMER SERVICE AND PERSONAL SERVICES COMMUNICATION TO SIPOA PROPERTY OWNERS AND TO THE SEABROOK ISLAND COMMUNITY

1. In this message, the Seabrook Island Property Owners Association (SIPOA) wishes to set out clearly for all individuals who are Property Owners and other persons who enter or wish to enter the Seabrook Island Development (SID) for a proper purpose, the guidelines and principles that SIPOA has established to govern the conduct of both the SIPOA Security Force (SSF) and the Seabrook Island Community within the SID. These guidelines and principles, once adopted by the Board pursuant to their authority as described in Addendum 1, become a part of the SIPOA Rules and Regulations, so that all enforcement mechanisms and procedures, including monetary assessments and rights of appeal, that are contained in the Rules and Regulations, apply to violations of the policies set forth in this document.
2. SID and SIPOA have a history dating to the 1980s, and over time, the Rules, Regulations and nature of the SSF have changed. For that reason, the following points of information are provided so that everyone's current expectations and actions can be governed accordingly:
  - a. What the Rules and Regulations require. To accomplish that objective, a copy of the current Rules and Regulations is attached to this message.
  - b. What the Security Force's function and duties are, and what they are not.
  - c. What SIPOA and the Security Force expect and require of each person who enters or attempts to enter the SID for any purpose.
3. "**Seabrook Island**" refers generally to an area that encompasses at least the following separate entities:
  - a. The Town of Seabrook Island is a public governmental entity whose area includes the land and property from the traffic circle at the intersection of Betsy Kerrison Parkway and Seabrook Island Road, to the beaches of Seabrook Island. The Town of Seabrook's jurisdiction, however, does not generally extend for enforcement purposes beyond the Gateway to the SID, except for the beaches to the level of high tide. The SSF has no responsibility for or authority over the areas under control of the Town of Seabrook Island. There are strict regulations concerning the environmentally protected areas of the beaches that are the subject of Town, State and Federal ordinances. **PLEASE OBEY ALL SIGNAGE REGARDING WILDLIFE HABITAT AND DOGS ON THE BEACH.**
  - b. The Seabrook Island Club (SIC) is a separate but affiliated entity of the Seabrook Island Community, whose property consists of the Golf Courses, the Tennis Center, the Equestrian Center, the Island House, the Beach Club, Pelican's Nest and

adjoining parking lots, and Seabrook Island Real Estate. The SSF does not have security service responsibility for or on SIC properties.

- c. Camp St. Christopher is a private religiously affiliated entity located within the Gateway. The SSF does not have security service responsibility for or on Camp St. Christopher.
  - d. Bohicket Marina and Village (not a part of the Seabrook Island Community). The SSF does not have security service responsibility for or on Bohicket Marina and Village.
  - e. Bay Pointe: property owners here are members of SIPOA, and the SSF has responsibility and authority within Bay Pointe as permitted by the Bay Pointe property owners organization.
  - f. Salt Marsh: property owners here are members of SIPOA and the SSF has responsibility and authority within Salt Marsh as permitted by the Salt Marsh property owners organization.
4. **The SID is PRIVATE PROPERTY.** The Seabrook Island Property Owners Association (SIPOA) has the authority under its Restrictive Covenants and Bylaws to preserve the property values and the quality of life on the SID through the
- a. Development and implementation of programs to provide for the health, safety, security and welfare of Property Owners and for members of the Seabrook Island Community within the SID;
  - b. Protection of roads, bridges, parks, playgrounds, beaches, open spaces, rights of way, easements, buildings and other SIPOA properties;
  - c. Retention of a Security Force, and implementation and enforcement of security measures to limit access to the SID to Property Owners and authorized members of the Seabrook Island Community; and
  - d. Adoption, distribution and enforcement of Rules and Regulations for the common good of Property Owners, including but not limited to rules and regulations pertaining to
    - i. Use of SI Community Property;
    - ii. Responsibilities and obligations of Property Owners and members of the Seabrook Island Community authorized to access the SID or to use the facilities and properties owned and/or operated by SIPOA;
    - iii. Security, safety and maintenance of good order within the SID; and
    - iv. Imposition of monetary and other sanctions for violations of Rules and Regulations within the SID.
  - e. Pursuant to the authority provided in the Covenants and Bylaws, and in addition to establishing the Rules and Regulations to guide everyone's conduct while on the SID for any reason, SIPOA has also contracted with a Vendor to provide a Security Force for the SID to assist in the enforcement of the Rules and Regulations and to uphold the undertakings for which authority is granted under the Covenants and Bylaws.
  - f. Even though the SID is private property, Federal, State and Local Governmental laws may apply as appropriate

5. **The SIPOA Security Force (SSF): its functions, its duties, and its conduct**

- a. The SSF and the individual Security Officers will provide security services according to its Mission Statement and the contract between the SSF owner and SIPOA.
- b. You should expect that the SSF will provide the following services:
  - i. Providing continuous SID access control at the Gateway entry Gate House, for 24 hours every day; except when declared states of emergency or ordered evacuations require the SSF to depart.
  - ii. Allowing onto the SID only those vehicles that meet the proper requirements for entry and that are operated by an individual who is properly qualified to operate the vehicle and to enter the SID.
  - iii. Allowing onto the SID only those individuals who meet the proper requirements for entry.
  - iv. Patrolling the Seabrook Island Community Property to help ensure that the Rules and Regulations are followed.
  - v. Enforcing traffic control and parking rules and regulations on Community Property on an everyday basis, but also in times of emergency (unless evacuated), in matters of urgent necessity, on holidays and during special events.
  - vi. Calling a towing service to remove an illegally parked vehicle
  - vii. Providing a first response to a report of a dangerous or sick wild animal on a property.
  - viii. Enforcement of speed limits and other moving violations of the Rules and Regulations using the means authorized by SIPOA.
  - ix. Providing assistance to civilian law enforcement and other civil authorities in emergencies and matters of urgent necessity, when needed.
  - x. Investigating complaints about violations of the Rules and Regulations.
  - xi. Issuing citations relating to alleged infractions of the rules and regulations that occur through visual observation in their presence, or after receiving information from eyewitnesses or others that an infraction has occurred and that the individual being issued the citation is the probable actor.

6. **The SSF is not authorized to perform “personal services”**, including but not limited to the following:

- a. Taking out or replacing trash cans.
- b. Assistance in changing flat tires unless the vehicle is disabled on the SID roadways and is creating an unsafe condition.
- c. Towing disabled vehicles that are otherwise properly parked and not abandoned.
- d. Providing “jump starts” to vehicles (SSF officers may assist SID Community members whose vehicles are disabled in public locations on SI Community Property, where, in the SSF Officer’s discretion, there is a matter of urgent necessity or emergency).
- e. Rendering personal assistance inside a residence unless in an emergency or matter of urgent necessity.
- f. Carrying groceries or other packages from a vehicle to or within a residence.
- g. House checks, unless connected with an alleged crime in progress, vandalism or ongoing sounding alarm.

- h. Providing transportation to members of the SI Community unless in an emergency or matter of urgent necessity, and only in the absence of any available alternative.
  - i. Any other form of personal services.
7. ***The SSF should not be the first call for a medical or fire or other emergency because first-hand knowledge of the situation that the property owner or resident making the call has. Therefore, calling the SSF in such circumstances will likely only delay the response***
8. ***For similar reasons, calling the SSF for assistance with MEDUCARE AIR TRANSPORT will also likely result in delays in response.***
9. ***However, SSF Security Officers may respond as requested by medical, fire or civilian law enforcement personnel for purposes of traffic control or other assistance, as otherwise noted in these Policies***
10. **What can you expect in your interactions with the SSF?**
- a. A professional appearance, attitude and demeanor.
  - b. Politeness and respect in conversation.
  - c. Timely responsiveness based on the nature of the request.
  - d. The ability and willingness to put you in touch with a supervisor promptly if a situation cannot be resolved on the spot.
11. **What does SIPOA expect from each person who is granted access to the SID, with respect to their interactions with the Security Force?**
- a. Compliance with and respect for SIPOA Rules and Regulations by all persons in the Seabrook Island Community, whether permanent or temporary, and including bicyclists, pedestrians and others who are sharing the roadways of the SID with vehicles.
  - b. Compliance with requests and directions given by Security Force officers in matters that are within their jurisdiction as outlined in this communication, Rules and Regulations, and SSF Post Orders.
  - c. Courtesy and respect in interactions with Security Force officers, regardless of the reason for the interaction.
12. ***New policy and reinforcement of existing Bylaw and Covenant provisions regarding responsibility of property owners and interference with SSF officers in the performance of their duties***
- a. **NEW POLICY**: it shall be a violation of the Rules and Regulations for any Property Owner, Contractor, Guest or Invitee of any type to
    - i.* Interfere in any manner with an SSF Officer in the performance of the officer's SSF duties; or
    - ii.* To refuse to stop for an SSF Officer who has clearly indicated that the individual in question should stop; or
    - iii.* To verbally or physically harass or refuse to cooperate with an SSF Officer in the performance of the SSF Officer's duties; or
    - iv.* To operate a vehicle within the SID in a manner that a reasonable person would appreciate presents a risk of harm or damage to person or property; or

- v. To attempt to avoid the Rule against passing bicyclists riding through traffic islands by driving on the wrong side of the road (i.e., the oncoming lane of traffic) when passing through the traffic island area.
- b. Bylaws Article 3.2.8 provides that Property Owners may be subject to personal liability for violations of the Rules and Regulations committed by Family Members, Tenants, Guests, and other invitees, if the person committing the infraction fails to respond or cannot be located. This includes contractors and other business invitees who enter the SID through a guest pass initiated by the Property Owner.

13. **IMPORTANT NOTICE REGARDING ELECTRONIC COLLECTION AND STORAGE OF CERTAIN INFORMATION**

- a. *There are valid and important reasons for the SSF, on behalf of SIPOA, to be able to affirmatively identify both the vehicles that are operating on the Seabrook Island Development and the persons who are operating vehicles that are permitted to access the Seabrook Island Development:*
  - i. *To ensure that the operator does in fact have a license to operate a motor vehicle*
  - ii. *To authenticate the individual who is operating the vehicle and match the operator to a property owner requested pass, particularly as to vendor- and contractor-day passes*
  - iii. *For purposes of matching a person to a license plate in the event of a violation of the Rules and Regulations, and ultimately to a property owner or other entity who under certain circumstances may be responsible for any violations*
- b. *For these reasons, every person who operates a vehicle on the SID is subject to producing, and is deemed to consent to producing, upon request by the SSF in the performance of their duties, and/or by SIPOA staff in connection with the issuance of vehicle access bar codes or passes, the following documentation:*
  - i. *A valid driver's license,*
  - ii. *Valid and current vehicle registration and license plate information;*
- c. *Currently, SSF officers will scan the driver's license of the operators of Contractor Vehicles, and will request to review, but not scan, the driver's license of the operator of a vehicle that enters on a pass issued by a Property Owner or the Property Owner's agent. ( Note: The driver's license scanner does NOT read the magnetic strip that is typically on the back of a driver's license, but only extracts certain printed data from the front of the license to populate entry passes.)*
- d. *Currently, the license plate of all vehicles that enter the SID through the "pass" lane is captured on video surveillance equipment.*
- e. *By entering onto the SID for any purpose, every person who operates a vehicle on the SID is subject to, and is deemed to consent to having driver's license information and registration data including but not necessarily limited to license plate, make and model of vehicle, collected by scanning or video equipment or video surveillance at the Gateway, or other video surveillance at points to be determined by SIPOA in accordance with the Rules and Regulations.*
- f. *Every vehicle operator and the owner of any vehicle operated on the SID is deemed to consent to SIPOA's collection of the information described above solely for*

*SIPOA's use in protecting the security of the SI Community and the enforcement of the Rules and Regulations, including the retention of such information on servers and databases owned and operated by SIPOA-authorized third party vendors, for a reasonable period, with the understanding that such collected information will not be shared with any other entities, except that such collected information may be provided in specific cases, and on an individualized basis, to authorized governmental law enforcement authorities upon a lawful request.*

**14. What should you do if you have a compliment, complaint or question about an SSF action, incident, reaction or activity?**

- a. In any such instance, please see the SSF Shift Supervisor who will be on duty at the Gateway entry Gate House.
- b. If you are not satisfied with the response given by the SSF Shift Supervisor, please ask to speak with the SSF Site Manager.
- c. If you remain unsatisfied, please contact SIPOA by personal visit to the SIPOA Administrative Office, by telephone to the SIPOA Admin Office during normal business hours, or by sending an email to [publiccomment@sipoa.org](mailto:publiccomment@sipoa.org).

APPROVED 12/19/2016

**ADDENDUM 5  
ACCESS AND FLOW CONTROL  
AT THE SID GATEWAY**

APPROVED 12/19/2016

## ADDENDUM 5

### ACCESS AND FLOW CONTROL AT THE SID GATEWAY

1. One of the primary roles relating to the safety and security of the SID is access control for vehicles and individuals. This is a specific topic identified in the Covenants and Bylaws, granting SIPOA the authority to take those actions necessary to ensure the safety, security and well-being of the Community Property and the members of the SI Community who seek access to and within the SID.
2. Access control is also important to ensure that SIPOA Property Owners and other members of the SI Community who must pay for the maintenance and upkeep of the roads, beaches, amenities and other facilities are not funding those who have no legitimate business or reason to be within the SID or to use its amenities, and that violators are identified and required to respond either monetarily or otherwise for violations of the Rules and Regulations.
3. “Access and Flow Control” of traffic at the Gateway entry Gate House is designed to maintain the flow of traffic of all types moving efficiently through the entry to SID without sacrificing security and access control. Access and flow control are now impeded by the current software and pass generation system and the lack of readily available turn-around space. Improvements are expected when the new Gate House is completed in early 2017 and an updated software system is implemented. Until then, some of the current friction between individuals seeking admission to the SID and the Security Force may be relieved by proper and mutually respectful communication.
  - a. The essential elements of access and flow control include addressing instances of insufficient information to permit access without slowing traffic flow.
    - i. Individuals with insufficient information or the lack of proper information to permit access will ordinarily be turned around to go to the end of the traffic line while their problems are addressed.
    - ii. Issuing temporary passes for visitors, contractors and vendors without access bar codes, guests, rental tenants, Camp St. Christopher visitors and other invitees is a process that is currently cumbersome because of the need for passes to be generated in real time. Individuals who do not have valid passes will generally be turned around, their necessary information gathered at a location other than at the Gate House, and then returned to the appropriate entry lane to receive their passes and enter the SID.
    - iii. Collecting Contractor Fees is a process that will be removed from the new Gateway entry Gate House.
    - iv. Individuals without a valid motor vehicle operator’s license will be stopped at the gate and refused entry until/unless a valid operator’s license can be produced. If an individual who is stopped after entering the SID fails to produce a valid motor vehicle operator’s license upon request, the vehicle that the person is operating will be quarantined in place until a motor

vehicle operator with a valid driver's license is present to operate the vehicle.

- b. Integrity of access bar codes is a continuing process that has many components, including the following:
- i. Property Owners and Long-term Renters must have access bar codes affixed permanently to their vehicle.
  - ii. Other than individuals who have rental cars and who will receive a rental car access bar code that is not affixed, any person who would otherwise be entitled to receive an access bar code but who refuses to have it affixed to his or her vehicle will NOT be issued a bar code sticker, but will be required to obtain a paper pass **daily**.
  - iii. A Property Owner who is driving a "loaner" vehicle for, e.g. the duration of repair or maintenance of a vehicle that has been issued a bar code, will be issued a paper pass.
  - iv. A Property Owner who is driving a rental vehicle may be issued a temporary access bar code for the duration of the rental.
  - v. Employees and contractors who are entitled to have access bar codes must also have the bar codes affixed permanently to their vehicle. An individual who is otherwise entitled to have an access bar code but who refuses to allow the bar code to be affixed to his or her vehicle will NOT be issued a bar code sticker, but will be required to obtain a **daily** paper pass.
  - vi. Property Owners who are delinquent in the payment of obligations owed to SIPOA and whose bar codes have been suspended will be required to obtain a **daily** paper visitor's pass.
  - vii. When a bar code is not recognized by the scanner at the Gateway, the vehicle may be turned around and sent to the SIPOA Administrative Office (during normal business hours) or issued a one-day pass (if not during normal business hours) until the issue is resolved.
  - viii. Seabrook Island Community members entitled to an access bar code sticker are obligated to keep SIPOA informed and updated about the make, model, year and license plate information of the vehicle to which the bar code sticker is attached.
- c. Special Events
- i. For any special events that will require more than one temporary pass of some sort, Seabrook Island Community members who are responsible for the event or otherwise extending invitations to guests or invitees who are not themselves SIPOA Property Owners, should contact the SIPOA Administrative Offices at least one week in advance of the event to make appropriate arrangements for access.
  - ii. SIPOA Property Owners may arrange individual passes through the SIPOA website ([www.SIPOA.org](http://www.SIPOA.org)) or by calling the information in to the SSF at the Gateway. Please have your PIN code when calling for passes.

**ADDENDUM 6  
ENFORCEMENT PROCEDURES**

APPROVED 12/19/2016

## **ADDENDUM 6 ENFORCEMENT PROCEDURES**

**Enforcement Procedures** is a term that describes the traffic control measures in place to prevent violations of the rules and regulations once a vehicle or person enters the SID, and to act against those who violate the rules and regulations. As they relate to the Seabrook Island Community, these procedures include the following:

1. **“Traffic stops”** are most often those encounters that occur when an SSF officer in a patrol vehicle observes an alleged moving violation of a rule or regulation (e.g. speeding, passing bicyclists in an island). Traffic stops can be potentially dangerous encounters because of the nature of moving vehicles, because of unknowns relating to the occupants of the allegedly offending vehicles, and because of the possibility of escalation of a potentially dangerous situation if an offending vehicle attempts to flee. For these reasons, SSF officers will make traffic stops only when they personally observe an infraction or when in their judgment someone’s personal safety is in peril if a stop is not undertaken. SSF Officers may also make traffic stops when they are performing radar speed control operations using hand-held or vehicle mounted speed detection equipment.
2. **“Pursuit”** is the attempt to overtake and then stop a vehicle whose occupants have committed an alleged violation of the rules and regulations. Because pursuit by its very nature implies the escalation of speed, and because it may incite allegedly offending individuals to attempt to flee and drive recklessly, pursuit by the SSF of individuals in vehicles who appear to be violating rules and regulations while within the SID, or of individuals who are attempting to exit from the SID after committing violations of rules and regulations on the SID, will only be employed under the following circumstances
  - a. Pursuit is limited to a distance not to exceed ½ mile from the site of the infraction or a pursuit speed more than 40 miles per hour (whichever occurs first), at which point pursuit will be discontinued if unsuccessful; or
  - b. As a last resort when the personal safety of the SID Community members is in jeopardy.
  - c. If pursuit is terminated or otherwise unsuccessful, the pursuing SSF Officer will report the fleeing vehicle information to the Gateway, so that appropriate measures can be taken to further identify the fleeing vehicle if it attempts to leave the SID.
3. **“Issuing citations”** is the process of informing an individual who has allegedly violated rules and regulations of the initiation of a formal process that memorializes the alleged infraction and indicates that a monetary or other sanction may be forthcoming.
4. **“Parking Control”** describes the actions taken by the Security Force to ensure that parking rules and regulations are monitored and that violators are identified.
  - a. Parking Control applies to all areas of the Seabrook Island Community Property (SICP) and expressly includes parking of all types of vehicles (including commercial vehicles, RVs and large trucks) and/or towed loads (e.g. boats and trailers).
  - b. Parking Control applies not only to common roadways and parking areas (e.g. Lake House or beach access), but also to Community open spaces,

regime/association parking lots (if permission is granted by the regime or association governing body—see paragraph c next), the Community Center and boat ramps.

- c. Exercising parking control in regime/association lots requires clear communication and coordination between the regime/association governing body and the Security Force to ensure that the SSF officers have the regime/association's permission to enter the property, to identify vehicles that are improperly parked and to ensure that the vehicle that has been reported to the SSF for citation or removal does not belong to an owner, guest or other invitee who has been given temporary permission to park at the regime/association lot.

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**ADDENDUM 7**  
**PHYSICAL PLANT/SSF FACILITIES AND**  
**VEHICLES**

APPROVED 12/19/2016

## ADDENDUM 7

### PHYSICAL PLANT/SECURITY FORCE FACILITIES AND VEHICLES

- 1 Physical Plant/SSF Facilities and Vehicles
  - a. Certain physical plant facilities, particularly the Gateway entry Gate House and associated parking lot and holding area, are occupied by SSF Officers on an around-the-clock basis every day.
  - b. These facilities are the first impression that everyone has of the SID as well as the Security Force; it is therefore important that these facilities always be kept in a clean and professional state both as to cleanliness and organization, with all systems operating.
  - c. It is the responsibility of the SSF to ensure that
    - i. The physical facilities and their surroundings are in good order, kept neatly, and present a fresh and professional appearance to those entering the area; and
    - ii. That all systems are in good operating condition, or that a work order or report has been made as to any malfunctioning systems.
  - d. The SSF also has for its use vehicles that bear the SIPOA name and logo. It is the responsibility of the SSF to ensure that
    - i. The vehicles are in good operating condition with all lights, emergency equipment, communications equipment and safety equipment functioning properly;
    - ii. The vehicles are operated in a safe, courteous and proper manner always;
    - iii. Any malfunctioning equipment or unsafe condition with the vehicles is reported immediately, and that the vehicle is not operated if it is unsafe or if all equipment is not working properly;
    - iv. Only individuals who have valid motor vehicle operating licenses sufficient to operate the vehicle in question are operating the security vehicles.
    - v. The vehicles are operated only for official SIPOA/SSF official business purposes.
  - e. Individuals who are not SSF Security Officers should not operate the SSF vehicles or ride in those vehicles, except that
    - i. Security Force supervisors may operate or ride in the vehicles as their duties dictate;
    - ii. Maintenance individuals who are servicing or otherwise authorized to operate the vehicles for purposes of maintenance.
- 2 **Property owners, residents, guests, employees or others not associated with the SSF or SIPOA operations may not ride in SSF vehicles** unless the SSF Officer driving the vehicle has communicated with the Shift Supervisor and, in the exercise of the SSF Officer's professional judgment, considers the transportation an emergency or other matter of urgent necessity.

# **Exhibit 1**

## **Current Rules and Regulations Access Pass Guide**

APPROVED 12/19/2016

OUTLINE FOR REVISED/NEW SAFETY AND SECURITY POLICIES—APPROVED 12/19/16

The following provisions govern the issuance and use of Entry Authentication Devices/Passes:

Quick Reference Device/Pass Guide

Category	Barcode	Paper Pass	Cost Each	Notes
Property Owner	Max 12/property		1-2 free 3-4 @ \$10.00 5+ @ \$50.00 Replacements @ \$5.00	
Property Owner Rental Car			\$10.00 Replacements @ \$10.00	
Long Term Renter	1/vehicle registered at the address		\$10.00 Replacements @ \$5.00	Copy of lease is required
Property Owner Family Member	no	yes	\$10.00	Annual Pass – expires 3/31
Family Member Rental Vehicle	no	yes		Owner requests via visitor pass system
Property Under Contract	no	yes		Valid until closing date. Island access only – no amenities
Non Property Owner Club member	1/Club member		\$10.00 Replacements @ \$5.00	
Contractor option 1	Issued Annually		Varies – see Commercial Access staff	Obtain at Gatehouse
Contractor option 2		Daily pass	\$10.00	Contractor Purchases at Gatehouse
Contractor option 3		Courtesy pass – max 12 per quarter		Owner requests via visitor pass system