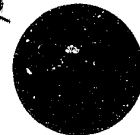


138852



MONOGRAPH

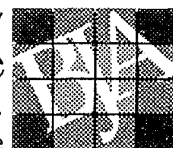
Multijurisdictional Narcotics Enforcement Task Forces: Lessons Learned from the OCN Program Model

THE ORGANIZED CRIME NARCOTICS
TRAFFICKING ENFORCEMENT
(OCN) PROGRAM

*Technical Assistance
Provided by*

**The Institute for
Intergovernmental Research**

Publication Funded by
Bureau of Justice Assistance



Office of Justice Programs ■ U.S. Department of Justice

138852

**Multijurisdictional
Narcotics Enforcement
Task Forces:
Lessons Learned from
the OCN Program Model**

**The Organized Crime
Narcotics Trafficking Enforcement
(OCN) Program**

August 1992

**Bureau of Justice Assistance
Office of Justice Programs
U.S. Department of Justice**

This project was supported by Cooperative Agreement Number 91-DD-CX-K017, awarded by the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. The Assistant Attorney General, Office of Justice Programs, coordinates the activities of the following program offices and bureaus: the Bureau of Justice Assistance, the Bureau of Justice Statistics, National Institute of Justice, Office of Juvenile Justice and Delinquency Prevention, and the Office of Victims of Crime. Points of view or opinions in this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice. The entire cost of the Cooperative Agreement, \$499,902, was financed with Bureau of Justice Assistance funds. The Cooperative Agreement provides for technical assistance and training, project coordination and operational performance assessment, and data collection and analysis for the Organized Crime Narcotics (OCN) Trafficking Enforcement Program.

138852

**U.S. Department of Justice
National Institute of Justice**

This document has been reproduced exactly as received from the person or organization originating it. Points of view or opinions stated in this document are those of the authors and do not necessarily represent the official position or policies of the National Institute of Justice.

Permission to reproduce this ~~copyrighted~~ material has been granted by

Public Domain/OJP/BJA

U.S. Department of Justice

to the National Criminal Justice Reference Service (NCJRS).

Further reproduction outside of the NCJRS system requires permission of the copyright owner.

Technical Assistance for this effort provided by:

**Institute for Intergovernmental Research
Post Office Box 12729
Tallahassee, Florida 32317**

Table of Contents

Chapter I - Introduction	1
Host Agencies	2
Program Guidance	4
Structure of Monograph	5
Chapter II - The Organized Crime Narcotics Trafficking Enforcement Program	7
The Crime Problem	7
The OCN Program	8
Program Strategy	8
Results Sought	9
Administrative Components	10
Program Components	12
Operational Requirements	15
Application Process	16
Site Selection	17
Contract Administration and Funding Chronology	18
Program Operational Results	20
Chapter III - The OCN Projects	23
Chapter IV - Program Implementation Experience and Lessons Learned	45
Role of Self-Evaluation in Program Improvements	45
Lessons Learned from Program Experience	46
Target Selection	46
Goals and Objectives	48

Case Selection Criteria	49
Interagency Agreements	50
The Control Group	51
Case Planning and Monitoring	55
Optional Components	56
Financial Investigations Components	56
Appendix	59
Recommended Model Objectives	61
Sample Interagency Agreement	65
Sample Case Plan	67

I. Introduction

This monograph has been prepared to assist the many local, state, and federal law enforcement and prosecution agencies which are joining forces and sharing resources to combat multijurisdictional narcotics trafficking crimes. The monograph describes the steps necessary to develop and implement one unique type of joint narcotics task force operation - the Organized Crime Narcotics Trafficking Enforcement Program - although the model presented contains information useful to the conduct of a wide range of multijurisdictional law enforcement efforts. Presented also are policies and procedures helpful for structuring task force operations, as well as the types of developmental problems encountered and the solutions attained.

Contained herein are experiences resulting from the initiation, development, and implementation of the Organized Crime Narcotics Trafficking Enforcement (OCN) Program. This Program received initial funding in 1986 from the Bureau of Justice Assistance (BJA), U.S. Department of Justice. The Program was subsequently awarded continuation funding to carry it beyond the date of this publication, although changes occurred in the number, scope, and location of project sites.

The period of coverage of OCN Program operation described in this monograph - from Program inception through June 30, 1990 - corresponds to the period during which OCN project funding administration was conducted under the auspices of a contractual relationship existing between the various OCN projects and the Institute for Intergovernmental Research (IIR). Subsequent to that time the OCN Program and its derivative operational projects were administered pursuant to direct grant awards from BJA.

Host Agencies

Although the OCN Program requires multi-agency participation, a process described in detail elsewhere in this monograph, a single state or local law enforcement agency applied for the federal funding and then administratively hosted the OCN project at each site. The twenty-one agencies which served as applicant/host agencies during the time period were:

<u>Host Agency</u>	<u>Initial Award Date</u>
Broward County Florida Sheriff's Department	1/1/87
Multnomah County Oregon District Attorney	1/25/87
Kansas City Missouri Police Department	1/30/87
Oklahoma Bureau of Narcotics and Dangerous Drugs	2/2/87
Florida Department of Law Enforcement	2/10/87
Harrison County Mississippi Sheriff's Department	2/16/87
Utah Department of Public Safety	3/12/87
Colorado Bureau of Investigation	4/13/87
Arizona Department of Public Safety	12/1/87
Pima County Arizona Sheriff's Department	12/1/87
Riverside California Police Department	12/1/87
Georgia Bureau of Investigation	12/1/87
Louisiana State Police	12/1/87
Maine Department of Public Safety	12/1/87
Suffolk County Massachusetts District Attorney	12/1/87
Las Vegas Nevada Metropolitan Police Department	12/1/87
New Jersey Department of Law and Public Safety	12/1/87

New Mexico Department of Public Safety	12/1/87
New York County New York District Attorney	12/1/87
Ohio Bureau of Criminal Identification and Investigation	12/1/87
Dallas County Texas Sheriff's Department	12/1/87

Program Guidance

Program management and support is provided to the OCN projects by the Bureau of Justice Assistance, United States Department of Justice, and policy guidance by the Office of Justice Programs, by means of a program guideline (entitled "Funding and Administration of the Organized Crime Narcotics Trafficking Enforcement Program") as well as other advice and assistance rendered from the inception of the Program.

From the initiation of the Program through June 30, 1990, the Institute for Intergovernmental Research was the recipient of a funding award from BJA, and at the direction of BJA executed contracts with the project host agencies for the accomplishment of Program operational objectives. In addition to contract administration activities, IIR provided technical assistance, operational performance assessment, and training services to the projects. IIR worked with the projects in developing measurable objectives, assisted the projects in development of ongoing self-evaluation capabilities, collected and analyzed project activity and operational information, and reported to BJA on the status and development of the projects. After the projects began receiving direct grant awards from BJA in July 1990, IIR continued its technical assistance role pursuant to a separate grant from BJA.

Structure of the Monograph

Following this introduction to the OCN Program, Chapter II describes the various elements which comprise the OCN Program, including its strategy, components, requirements, and results sought and obtained. Chapter III of this monograph briefly describes each OCN project. The administrative and operational experiences of the projects are described in Chapter IV, along with lessons learned from the operation of the Program.

II. The Organized Crime Narcotics Trafficking Enforcement Program

The Crime Problem

Despite long-standing efforts to overcome organized crime and narcotics trafficking, the enormous profits derived from these illicit activities make their control the greatest challenge facing American law enforcement today. Developing effective cases against high echelon narcotics trafficking conspirators requires the maximum utilization of investigative expertise, as well as innovative techniques. Successful cases most often result when skilled local, state, and federal investigators and prosecutors pool their resources, capabilities, and expertise in planned and coordinated enforcement actions.

The absence of investigation and prosecution coordination - that is, the diffusion of responsibility among local, state, and federal law enforcement agencies - works to the advantage of organized criminal groups. Major narcotics trafficking criminal conspiracies span jurisdictional boundaries, requiring multiple agencies to successfully investigate and prosecute offenders.

Individual law enforcement agencies often lack the capabilities to assemble or exchange intelligence about such criminal conspiracies, or to centrally manage and effectively allocate their resources, or to coordinate their enforcement efforts. Typically, too, they also possess only part of the legal authority necessary for a unified response to the criminal threat. Consequently, the enforcement community's reaction to major narcotics offenses may be fragmented, limited, or even counterproductive.

The OCN Program

In response to this analysis of multijurisdictional narcotics trafficking conspiracies and the shortcomings of many law enforcement responses, the Organized Crime Narcotics Trafficking Enforcement Program was developed in late 1986 by the Bureau of Justice Assistance as a discretionary grant program.

The goal of the OCN Program is to enhance, through the shared management of resources and joint operational decision-making, the ability of local, state, and federal law enforcement agencies to remove specifically targeted major narcotics trafficking conspiracies and offenders through investigation, arrest, prosecution, and conviction.

The OCN Program traces its roots to previous efforts such as the Joint Organized Crime Investigations Project in Dade County, Florida, the New England Organized Crime Strike Force, the multi-state Leviticus coal fraud project, and the U.S. Department of Justice Organized Crime and Racketeering Strike Forces. These model efforts demonstrated the success of multi-agency investigations and prosecutions and the benefits of sharing intelligence, resources, and management decision-making.

Program Strategy

The strategy of the OCN Program is twofold:

- o To promote a multi-agency enforcement response - including a prosecution strategy - targeted against major narcotics trafficking operating across multiple jurisdictions, and;

- o To establish a formal mechanism whereby investigative and prosecution resources can be allocated, focused, and managed on a shared basis against targeted offenses and offenders.

Critical to the success of the OCN Program is a shared management system to direct and administer the joint enforcement resources. Overall direction is shared equally by the participating law enforcement agencies, and all decisions regarding operations and administration must be unanimous. This accomplishes several purposes. First, criteria are mutually established to identify, select, and prioritize investigative targets. Cases are then assigned as a part of the shared management system for the initiation of investigations and their subsequent prosecution. The resources and skills required in the investigative and prosecution process are identified, acquired, and assigned throughout the duration of the case. Finally, the OCN management system coordinates and monitors cases to ensure proper timing of investigative and prosecution activities, as well as to facilitate decision-making concerning case continuance, referral, redirection, and closure.

Results Sought

It is expected that successful implementation of projects within the OCN Program will result in some or all of the following outcomes:

- o Development of an overall enforcement strategy which includes:
 - Identification and targeting of major narcotics trafficking conspiracies for priority enforcement action;
 - Planning for all personnel and technical resources required to pursue the investigation and prosecution of individuals involved in those conspiracies; and

- Active involvement of agencies necessary to pursue those conspiracies;
- o Selection of a management system for the shared coordination and direction of the personnel, financial, equipment, and technical resources necessary for the investigation and prosecution of targeted conspirators in support of the project's overall enforcement strategy;
- o Investigation and prosecution of major multijurisdictional narcotics traffickers;
- o Promotion of civil remedies and recovery of criminal assets such as:
 - Assets acquired with funds traceable to criminal activity;
 - Assets used in the commission of crimes; and
 - Contraband and stolen property;
- o Reduction of fractional and duplicative investigations and prosecutions; and
- o Cooperation and coordination of efforts, as appropriate, among OCN projects and with other BJA-funded projects.

Administrative Components

Each OCN project is required to be comprised of a formally organized group of participating law enforcement agencies, one of which is the applicant agency, and a management Control Group. These terms are described below.

Participating Agencies. Each OCN project is composed of participating law enforcement agencies which include at a minimum one federal agency and one state or local agency, and each OCN project must include a prosecutor. At each project,

the senior agency administrators of the participating agencies sign a formal intergovernmental agreement, or memorandum of understanding, affirming their intent to fully participate in the management and operations of the project. The agreement is intended to be brief and simply stated, addressing the goals and objectives of the project, the anticipated contributions of resources and expertise of each participant, and a projected end date, after which the need for continuing participation in the project can be reconsidered with minimal threat of acrimony.

Applicant Agency. One of the participating state or local agencies serves as the applicant, accepting not only responsibility for preparation of the grant application, but for project administrative and financial matters as well.

Control Group. Each project is required to form a management Control Group comprised of the senior operations managers of those agencies expected to be most involved in cases conducted by the project. Because federal funds form the basis for the Program and because of the U.S. Drug Enforcement Administration's (DEA) significant national drug enforcement role, the inclusion of DEA on the Control Group is mandatory. Recognizing the need for early prosecutive involvement in project cases, membership on the Control Group is also mandated for either a federal, state, or local prosecutor.

The Control Group is the mechanism within the OCN Program which is intended to prevent any single agency from controlling or dominating a project. The OCN Program is designed so that the identity of the project, as well its control, are equally shared by all participants. Members of the Control Group have an equal vote on all matters before the Group, and the decisions of the Control Group must

be unanimous. Members of the Control Group jointly establish policies to select cases to be investigated, to allocate, direct, and manage project resources, and to manage project investigations. Law enforcement agencies may participate in OCN casework, however, without being members of the project Control Group.

Program Components

The focus of the OCN Program is directed at providing shared or pooled resources for narcotics trafficking conspiracy investigations. The OCN Program initially began with the award of the "Basic" component; funding was limited to reimbursement of specified covert investigative expenses. As the Program continued in existence, the Basic awards were often supplemented periodically with additional funds for the same purpose (the "Addition to Basic" component).

Another grant component of the Program came about with the establishment of the "Operational Support" award for the payment of overtime monies on a case-by-case basis for personnel working on OCN project investigations and prosecutions. Finally, the "Financial Investigations" component of the OCN Program was created to support personnel devoted to conducting financial investigations into narcotics traffickers and their illicit organizations.

Basic Component. Basic OCN Program funds are directed at the reimbursement of covert investigative expenditures only, and not for purposes such as salaries, fringe benefits, equipment, or construction. Basic funds pay for confidential investigative expenses such as the purchase of services, the purchase of evidence, and the purchase of information.

Addition to Basic Component. Limited funds were made available to supplement the Basic award. The Addition to Basic award is for the same purposes as the Basic award, and is made available based on an OCN project's identified problems and needs, its successful investigation of the type of cases targeted, the level of cooperation among the project Control Group members, the level of investigative activity, and the record of effectiveness of the project's expenditure of funds.

Operational Support Component. Projects may also be provided funds to pay for overtime salary expenses of personnel working on approved OCN project cases.

Criteria for approval of this optional component are:

- o Provision of justification by the applicant that the type of cases to be investigated with the requested funding could not be successfully pursued to the maximum extent possible without operational (overtime) support;
- o Lack of available funds from existing sources;
- o The likelihood that the requested funds will contribute to accomplishment of project goals;
- o Submission of overtime policies and procedures that will govern the use of the funds by the project, which must include a provision that requests for payment of overtime for each OCN case will be approved by the case supervisor; and
- o Assurance that documentation will be included in each case investigative plan establishing that operational support funds are necessary for the specific case and approval of the same by the Control Group.

Financial Investigations Component. Additional funds are made available to selected projects to implement a Financial Investigations component. This component is designed to:

- o Increase the number of narcotics related financial crime investigations and prosecutions; and
- o Develop a comprehensive operational approach to the identification of financial resources of narcotics traffickers and the investigation and prosecution of those traffickers, including the recovery of assets related to the criminal activity.

Funds are provided to develop a comprehensive, proactive law enforcement approach involving the tracing of narcotics related financial transactions, analysis of the movement of currency, identification of criminal financial structures and money laundering schemes, asset forfeiture administration, and the provision of financial investigation and analysis techniques training.

The funding provided for each financial investigations component establishes a core financial investigations staff which includes investigator/accountants and analysts. Project financial investigative staff are expected to receive extensive specialized training in financial investigative techniques, asset seizure and forfeiture, and elements of financial crimes. Personnel costs, including fringe benefits and indirect costs, are permitted for grant funding. Grant funds are also approved for office furniture, supplies, rental of office space, and travel expenses for investigative and training purposes.

Limited funds are also made available for microcomputer hardware and software for the tracking, analysis, and reporting of financial investigation cases directly related to OCN Program activities. Projects are also permitted to hire

investigative accountant consultants for advice and instruction during the start-up period.

Applicants requesting a Financial Investigations component are asked to provide information as to how funds will be used to target investigations that focus on:

- o Uncovering how funding is raised for the illegal purchase of drugs and who provides such funding;
- o Discovering how profits from illegal drug transactions are laundered;
- o Identifying profits and assets resulting from illegal drug trafficking; and
- o Seizing assets gained from illegal drug trafficking under Racketeer Influenced Corrupt Organization (RICO) or Continuing Criminal Enterprise (CCE) laws, or similar state statutes.

Operational Requirements

The OCN Program Guideline prescribes the following operational activities and requirements:

- o Each project is required to provide formal procedures and processes governing the conduct of project activities including target selection, allocation of resources, investigative and prosecution plans, and case selection;
- o Each project must be capable of conducting coordinated investigations and prosecution of selected targets in a timely and thorough manner;
- o All enforcement operations initiated under the project must be based upon a formal investigative/prosecution plan setting forth case objectives,

resources required, specific enforcement activities to be taken, agencies involved, and a prosecution strategy;

- o There must be state and/or local agency participation in each project case;
- o There must be federal agency participation in each project case;
- o OCN project Basic funds may be used to support project investigations for such purposes as vehicle rental, surveillance costs, and purchase of supplies, evidence, and information;
- o Each project case is required to be fully coordinated with DEA and applicable U.S. Department of Justice Organized Crime Drug Enforcement Task Forces (OCDETF); and
- o Unanimous consent of a Control Group is required to initiate funding of a project investigation.

Application Process

In October 1986, the Bureau of Justice Assistance awarded a grant to the Institute for Intergovernmental Research to provide technical assistance and contract administration services to assist in the implementation of up to ten OCN Program project sites. Following publication of the BJA discretionary grant program funding announcement describing the OCN Program, the application process began. Initially, interested agencies submitted a preliminary application to IIR and provided other information necessary for IIR to make site selection recommendations to the Bureau of Justice Assistance.

The preliminary application required the following descriptive information, which was deemed important to selection of appropriate OCN project locations:

- o The multijurisdictional narcotics enforcement problems and needs to be addressed by the proposed project;
- o The goals and objectives to be achieved, along with milestones and major achievements to be accomplished;
- o Proposed project operations, including administrative decision-making processes; and
- o A list of participating agencies, including their resources to be contributed and their anticipated role in the project.

In addition to the standard certifications required in all applications for BJA funding, prospective OCN applicants were required to submit an Interagency Agreement signed by each of the Control Group members.

Site Selection

Once a proposed site received preliminary approval by BJA, IIR staff typically conducted a site visit and requested additional information to assist the process of final selection and approval by BJA.

BJA used the following criteria to select OCN sites:

- o In the multijurisdictional geographic area being proposed, the nature and magnitude of conspiratorial drug crime;
- o The capacity and experience of the participating agencies to conduct a complete and fully coordinated project;
- o Potential for effective joint agency management and direction of investigations and prosecutions;
- o The presence of a coordinated approach to the crime problem;

- o The use of standardized procedures for information collection and dissemination, for joint case administration, and for investigative techniques;
- o Proposed criteria to be used in the selection and prosecution of cases; and
- o The anticipated impact on the crime problem and the criminal justice system.

Contract Administration and Funding Chronology

Beginning in January 1987, following BJA approval, IIR executed contracts with eight successful applicant agencies for OCN Program Basic awards of \$170,000 each. In August 1987, IIR entered into a cooperative agreement with BJA to enhance and expand the OCN Program. Subsequently the contracts of four initial projects were modified to add Operational Support and Financial Investigations components. The Operational Support awards were \$80,000 per project and those for Financial Investigations components ranged from \$33,650 to \$293,283.

In December 1987, funding for the OCN Program was enhanced so as to allow thirteen new projects to enter into OCN contracts. Of this number, twelve sites received Basic awards ranging from \$141,120 to \$170,000. Ten of these projects also received Operational Support funding awards ranging from \$75,000 to \$80,000, and six of the thirteen new projects received Financial Investigations component awards ranging from \$231,406 to \$450,000.

The contract with one of the original eight projects lapsed in March 1988, and was not renewed.

In January 1989, BJA extended the OCN cooperative agreement through July 1989, allowing renewal and extension of appropriate project contracts. As their enforcement operations continued, several projects requested and received Addition to Basic awards, the first having been awarded in January 1988 and the last in August 1989. These supplemental awards varied from \$50,000 to \$150,000 depending upon the need demonstrated.

In early 1989, because of the preliminary success of the OCN Program's Financial Investigations components, the Bureau of Justice Assistance created a separate discretionary grant funding program entitled the Financial Investigations (Finvest) Program. OCN projects which had Financial Investigations components were encouraged to apply for BJA direct awards in the new Program. In March 1989, the first OCN project received a Finvest award, and by September, five more had made the transition into the Finvest Program. There were not sufficient funds, however, for all OCN projects to transfer their Financial Investigations components to the Finvest Program.

In August 1989, the BJA Program Office, in anticipation of making direct awards to OCN project sites, extended IIR's cooperative agreement through June 1990. Contracts with each of the OCN projects were modified accordingly, adjusting and redistributing funds among the projects.

BJA began making direct awards to OCN projects effective July 1990, for initial twelve month periods. Three of the original OCN projects completed their involvement in the Program at that time and did not receive new awards. The direct Basic awards ranged from \$95,000 to \$190,000. In May 1990, IIR's cooperative agreement was extended through May 31, 1991. Although all of the IIR contracts

with OCN projects terminated June 30, 1990, IIR continued to provide technical assistance and training to the OCN Program.

In addition to continuation funding for active OCN projects, BJA announced the availability of funds for new OCN projects on a competitive basis. Applications were considered by a peer review panel designated by BJA, and in October 1990, four new OCN projects received awards of from \$135,842 to \$152,892 for Basic and Operational Support components.

Program Operational Results

The exhibit below titled "Summary of OCN Project Outcomes" presents consolidated outcome information reported by the OCN projects in a number of categories. The data was obtained from Categorical Grant Progress Reports submitted quarterly through IIR to BJA. Comparisons of activity levels between individual projects were not encouraged because each project's geographic region of operation was unique, and because goals and objectives were specifically designed for each project.

Summary of OCN Project Outcomes

January 1987 - June 1990

Arrests.....	10,145
Cocaine Seized	\$185,100,378
Marijuana Seized	\$61,019,135
Heroin Seized.....	\$5,708,097
Chemicals/Products Seized.....	\$11,151,559

Cash/Securities Seized.....	\$20,032,294
Real Estate Seized.....	\$33,590,603
Vehicles Seized	\$8,565,421
Jewelry/Personal Property Seized	\$5,247,179
Aircraft Seized.....	\$725,000
Vessels Seized.....	\$571,500
Firearms Seized.....	\$164,778

III. The OCN Projects

This chapter contains summary descriptions of the initial twenty-one OCN projects. Each summary describes briefly the OCN project goals, target areas, dates and amounts of key funding actions, and Control Group member agencies.

Arizona Department of Public Safety

This OCN project, hosted by the Arizona Department of Public Safety, focused on illegal importation of narcotics into Arizona and other border states. Also targeted, but of lesser priority, was the detection and destruction of illicit drug laboratories. The project's Financial Investigations component was established to identify and seize assets associated with illegal narcotics activity.

OCN project operations began in early 1988. Other Control Group member agencies included the U.S. Attorney's Office, U.S. Customs Service, and the U.S. Drug Enforcement Administration.

DATE	ACTION	BASIC OCN	OPERATIONAL SUPPORT	FINANCIAL INVESTIGATIONS
12/01/87	Initial Contract :	\$170,000	\$80,000	\$250,000
08/11/89	Amount Adjusted To :	\$ 95,000	\$80,000	\$165,000
06/30/90	Contract Ended	\$ 38,136	\$69,730	\$163,869

Pima County, Arizona, Sheriff's Department

This OCN project joined the applicant, the Pima County Sheriff's Department, with the Yuma County Sheriff's Department, Santa Cruz County Sheriff's Department, Cochise County Sheriff's Department, Tucson Police Department, Yuma Police Department, Douglas Police Department, Nogales Police Department, Pima County Attorney's Office, Arizona Department of Public Safety, U.S. Drug Enforcement Administration, U.S. Border Patrol, and the U.S. Customs Service. The joint effort targeted narcotics smuggling and distribution across and along the Arizona/Mexico border.

DATE	ACTION	BASIC OCN	ADDITION TO BASIC	OPERATIONAL SUPPORT
12/01/87	Initial Contract :	\$170,000		\$ 80,000
08/14/89	Component Added :		\$100,000	
06/01/90	Amount Adjusted To :	\$170,000	\$ 80,000	\$ 80,000
06/29/90	Amount Adjusted To :	\$143,000	\$ 67,000	\$120,000
06/30/90	Contract Ended	\$143,000	\$ 51,870	\$118,018

Riverside, California, Police Department

The applicant agency, the Riverside Police Department, joined the Riverside County Sheriff's Department, U.S. Drug Enforcement Administration, and the Riverside District Attorney in attacking major narcotics violators in and around Riverside County, California. Ultimately, a major portion of this OCN project's resources were focused on groups which manufactured and distributed methamphetamine.

Subsequent to the original award, the project received funding for a Financial Investigations component to identify, seize, and process for forfeiture assets derived from illegal narcotics enterprises.

DATE	ACTION	BASIC OCN	ADDITION TO BASIC	OPERATIONAL SUPPORT	FINANCIAL INVESTIGATIONS
12/01/87	Initial Contract :	\$170,000		\$80,000	
07/27/89	Components Added :		\$85,000		\$199,883
06/01/90	Amount Adjusted To :	\$170,000	\$65,000	\$80,000	\$149,883
06/30/90	Contract Ended	\$170,000	\$31,605	\$80,000	\$148,858

**Colorado Department of Public Safety
Bureau of Investigation**

This OCN project's operations involved detection and disruption of major narcotics offenders and their associates who utilized general aviation aircraft as the principal mode of illegal distribution into and out of Colorado.

Along with the applicant, the Colorado Department of Public Safety, the project included the following participants: the Alamosa County Sheriff's Department, Colorado Attorney General, Colorado District Attorney's Council, U.S. Drug Enforcement Administration, U.S. Attorney, and the U.S. Customs Service.

DATE	ACTION	BASIC OCN	ADDITION TO BASIC
04/13/87	Initial Contract :	\$170,000	
08/01/89	Component Added :		\$57,000
12/31/89	Contract Ended	\$166,415	\$ 0

Florida Department of Law Enforcement

This OCN project joined the applicant Florida Department of Law Enforcement, the Alabama Bureau of Investigation, U.S. Drug Enforcement Administration, Georgia Bureau of Investigation, South Carolina Law Enforcement Division, and the U.S. Customs Service. The project operated from February, 1987 until March, 1988.

The project sought to combine the short-range radar detection capabilities of National Guard units from the participating states with the investigative capabilities of the participant law enforcement agencies to detect and intercept airborne smuggling operations along the coast of the Southeastern United States.

DATE	ACTION	BASIC OCN
02/10/87	Initial Contract :	\$170,000
03/30/88	Contract Ended	\$119,920

Broward County, Florida, Sheriff's Department

With the Broward County, Florida, Sheriff's Office as applicant agency, this OCN project's Control Group originally consisted of the U.S. Drug Enforcement Administration, Florida Division of Alcoholic Beverages and Tobacco, and the Pompano Beach Police Department. Subsequently the Pompano Beach Police Department left the project and the U.S. Attorney's Office and Federal Bureau of Investigation joined.

The project's original goals included development of a coordinated multi-agency law enforcement prosecution effort against major organized crime and narcotics conspiracies. With the addition of a Financial Investigations component, the project also planned to seize assets gained from illegal drug activity.

DATE	ACTION	BASIC OCN	ADDITION TO BASIC	OPERATIONAL SUPPORT	FINANCIAL INVESTIGATIONS
01/01/87	Initial Contract :	\$170,000			
12/23/87	Components Added :			\$79,396	\$124,484
01/15/88	Component Added :		\$150,000		
08/26/88	Amount Adjusted To :	\$170,000	\$300,000	\$79,396	\$124,484
07/25/89	Amount Adjusted To :	\$170,000	\$450,000	\$57,284	\$146,596
01/04/90	Amount Adjusted To :	\$170,000	\$456,702	\$39,978	\$157,200
06/30/90	Contract Ended	\$170,000	\$456,702	\$39,978	\$157,200

Georgia Bureau of Investigation

From its inception, this OCN project focused exclusively on narcotics-related financial investigations. In addition to the applicant agency, the Georgia Bureau of Investigation, the Georgia Attorney General's Office and the U.S. Drug Enforcement Administration were participants. Together they sought to fill a void in state efforts to seize assets of major drug traffickers, and to provide information to federal agencies for asset seizure where state law did not apply.

In October 1989, the project was transferred to the BJA Financial Investigations Program.

DATE	ACTION	FINANCIAL INVESTIGATIONS
12/01/87	Initial Contract :	\$349,556
07/27/89	Amount Adjusted To :	\$279,556
09/30/89	Contract Ended	\$271,396

Louisiana State Police

The applicant agency, the Louisiana State Police, and the U.S. Drug Enforcement Administration, Texas Department of Public Safety, and the U.S. Attorney's Office served as the Control Group for this OCN project. The project targeted the manufacture and distribution of methamphetamine in the Sabine Strip along the Texas/Louisiana border.

DATE	ACTION	BASIC OCN	OPERATIONAL SUPPORT
12/01/87	Initial Contract :	\$170,000	\$80,000
08/01/89	Amount Adjusted To :	\$ 60,000	\$80,000
02/22/90	Amount Adjusted To :	\$ 54,532	\$85,468
06/30/90	Contract Ended	\$ 42,370	\$83,057

Maine Department of Public Safety

Coincidental to the initiation of this OCN project, legislation formed the Maine Bureau of Intergovernmental Drug Enforcement (BIDE), a new effort joining narcotics investigators from the Maine State Police, municipal police departments, and sheriff's departments. Control Group members in addition to the Maine Department of Public Safety (BIDE) were the U.S. Drug Enforcement Administration, Maine Attorney General, and the U.S. Attorney's Office.

The OCN project targeted cocaine smugglers and wholesalers.

DATE	ACTION	BASIC OCN	ADDITION TO BASIC	OPERATIONAL SUPPORT
12/01/87	Initial Contract :	\$170,000		\$80,000
08/01/89	Component Added :		\$85,000	
06/11/90	Amount Adjusted To :	\$170,000	\$35,000	\$80,000
06/30/90	Contract Ended	\$165,000	\$21,298	\$37,311

**Suffolk County, Massachusetts
District Attorney's Office**

The participants in this OCN project consisted of the applicant Suffolk County, Massachusetts, District Attorney's Office, the U.S. Drug Enforcement Administration, and the U.S. Attorney's Office.

The project targeted major narcotics trafficking conspiracies in Suffolk County, and its principal city of Boston. The Financial Investigations component sought to identify and seize assets accumulated by these conspirators.

DATE	ACTION	BASIC OCN	OPERATIONAL SUPPORT	FINANCIAL INVESTIGATIONS
12/01/87	Initial Contract :	\$170,000	\$80,000	\$350,000
08/01/89	Amount Adjusted To :	\$ 90,000	\$80,000	\$215,000
11/29/89	Amount Adjusted To :	\$ 71,167	\$70,000	\$243,833
06/30/90	Contract Ended	\$ 56,565	\$64,018	\$243,833

Harrison County, Mississippi, Sheriff's Department

The Harrison County, Mississippi, Sheriff's Department, the applicant agency, along with the U.S. Drug Enforcement Administration and the Mississippi Bureau of Narcotics, sought to develop a unified enforcement and prosecutive strategy to maximize criminal and civil remedies against targeted offenders along the Mississippi Gulf Coast. This strategy was intended to reduce the availability of illicit drugs and the number of drug-related crimes.

DATE	ACTION	BASIC OCN
02/16/87	Initial Contract :	\$170,000
08/01/89	Amount Adjusted To :	\$115,000
06/30/90	Contract Ended	\$ 85,995

Kansas City, Missouri, Police Department

Originally stating that it wished to identify and document the organization and leadership of area crack cocaine distributors, this OCN project group later expanded its objective to include financial investigations of drug trafficking conspiracies.

The applicant agency, the Kansas City, Missouri, Police Department, worked with the following participating agencies since the grant's inception: the U.S. Drug Enforcement Administration, Federal Bureau of Investigation, Jackson County, Missouri, Drug Task Force, U.S. Attorney's Office, U.S. Bureau of Alcohol, Tobacco, and Firearms, and the U.S. Customs Service.

DATE	ACTION	BASIC OCN	ADDITION TO BASIC	OPERATIONAL SUPPORT	FINANCIAL INVESTIGATIONS
01/30/87	Initial Contract :	\$170,000			
11/30/87	Components Added :			\$80,000	\$33,650
06/24/88	Component Added :		\$130,000		
08/01/89	Amount Adjusted To :	\$170,000	\$180,000	\$80,000	\$33,650
06/30/90	Contract Ended	\$170,000	\$139,444	\$80,000	\$32,595

Las Vegas, Nevada, Metropolitan Police Department

The Las Vegas, Nevada, Metropolitan Police Department, the applicant agency, along with the Clark County District Attorney, U.S. Drug Enforcement Administration, and the U.S. Attorney's Office, combined resources to investigate, prosecute, and convict major narcotics traffickers.

Subsequently, the OCN project's Financial Investigations component was funded to focus on financial intermediaries, to trace drug money through gambling casinos, and to use RICO, CCE, and money laundering statutes to seize assets.

DATE	ACTION	BASIC OCN	OPERATIONAL SUPPORT	FINANCIAL INVESTIGATIONS
12/01/87	Initial Contract :	\$170,000	\$80,000	\$231,406
04/01/89	Amount Adjusted To :	\$249,675	\$80,000	\$ 57,296
08/01/89	Amount Adjusted To :	\$199,675	\$80,000	\$ 57,296
06/30/90	Contract Ended	\$199,675	\$80,000	\$ 57,296

New Jersey Department of Law and Public Safety

Control Group agencies for this OCN project were the applicant New Jersey Department of Law and Public Safety, the U.S. Drug Enforcement Administration, New Jersey State Police, New York State Police, Pennsylvania State Police, Delaware State Police, and U.S. Customs Service.

The original project goal was to interdict air smuggling of cocaine. to locate and destroy clandestine cocaine laboratories, and to use the Financial Investigations component to identify and seize illegal narcotics assets. The Control Group subsequently enlarged the project's focus to include narcotics distribution conspiracies of all types.

DATE	ACTION	BASIC OCN	OPERATIONAL SUPPORT	FINANCIAL INVESTIGATIONS
12/01/87	Initial Contract :	\$141,120	\$75,000	\$361,289
08/01/89	Amount Adjusted To :	\$124,120	\$80,000	\$ 71,289
04/20/90	Amount Adjusted To :	\$ 76,712	\$72,302	\$126,395
06/30/90	Contract Ended	\$ 61,810	\$62,254	\$113,424

New Mexico Department of Public Safety

The applicant agency, the New Mexico Department of Public Safety, combined with the U.S. Drug Enforcement Administration, New Mexico Intensified Narcotics Enforcement Team, and the U.S. Customs Service to form this OCN project. Subsequently, the Intensified Narcotics Enforcement Team was replaced by the New Mexico Attorney General's Office.

The project's goal was to conduct coordinated multijurisdictional investigations and prosecutions into targeted organized criminal narcotics trafficking conspiracies and offenders operating in or through New Mexico.

DATE	ACTION	BASIC OCN	OPERATIONAL SUPPORT
12/01/87	Initial Contract :	\$170,000	
04/18/88	Component Added :		\$80,000
08/01/89	Amount Adjusted To :	\$192,500	\$36,500
06/01/90	Amount Adjusted To :	\$127,500	\$51,500
09/30/90	Contract Ended	\$121,811	\$51,180

**New York County, New York
District Attorney's Office**

The New York County, New York, District Attorney's Office, the applicant agency, joined with the U.S. Drug Enforcement Administration and the New York City Special Narcotics Prosecutor's Office to establish an OCN project. They had as a goal the investigation, prosecution, and conviction of major heroin and cocaine importation rings based in the New York City area.

The project's Financial Investigations component was funded to identify, trace, and seize the assets of the organizations investigated.

DATE	ACTION	BASIC OCN	ADDITION TO BASIC	FINANCIAL INVESTIGATIONS
12/01/87	Initial Contract :	\$170,000		\$430,000
06/01/89	Component Added :		\$150,000	
06/30/90	Contract Ended	\$170,000	\$149,942	\$430,000

**Ohio Bureau of Criminal
Identification and Investigation**

The applicant agency, the Ohio Bureau of Criminal Identification and Investigation, along with its Control Group members, the Dayton Police Department, U.S. Drug Enforcement Administration, Kettering Police Department, Montgomery County Sheriff's Department, Montgomery County Prosecutor's Office, and the U.S. Attorney's Office, established as a goal the investigation and prosecution of mid-to-high level narcotics traffickers operating in and around Montgomery County, Ohio.

DATE	ACTION	BASIC OCN	OPERATIONAL SUPPORT
12/01/87	Initial Contract :	\$170,000	\$80,000
08/01/89	Amount Adjusted To :	\$120,000	\$65,000
06/30/90	Contract Ended	\$111,513	\$53,902

Oklahoma State Bureau of Narcotics

The original Control Group members, along with the applicant Oklahoma State Bureau of Narcotics, were the Custer County Sheriff's Office, U.S. Drug Enforcement Administration, Enid Police Department, Midwest City Police Department, Muskogee Police Department, Norman Police Department, Tulsa County Sheriff's Office, and the U.S. Air Force Office of Special Investigations. The Dell City Police Department joined the group later.

The principal goal of the OCN project was to disrupt illicit drug manufacturing and trafficking in Oklahoma by coordinating investigative efforts and sharing resources.

DATE	ACTION	BASIC OCN
02/02/87	Initial Contract :	\$170,000
07/31/89	Contract Ended	\$151,766

**Multnomah County, Oregon
District Attorney's Office**

The OCN project Control Group was composed of the Multnomah County, Oregon, District Attorney's Office, the applicant agency, and the Clackamas County Sheriff's Office, U.S. Drug Enforcement Administration, Multnomah County Sheriff's Office, Oregon State Police, Portland Police Bureau, U.S. Attorney's Office, and the Washington County Sheriff's Office.

The project's goal was the reduction of regional drug trafficking through coordinated enforcement and prosecution of targeted drug traffickers. Specifically, the project focused on tar heroin, cocaine, methamphetamines, and marijuana. The Financial Investigations component targeted illegally obtained narcotics assets, and initiated their seizure and forfeiture.

DATE	ACTION	BASIC OCN	ADDITION TO BASIC	OPERATIONAL SUPPORT	FINANCIAL INVESTIGATIONS
01/25/87	Initial Contract :	\$170,000			
12/14/87	Components Added :			\$80,000	\$293,283
06/24/88	Component Added :		\$130,000		
08/01/89	Amount Adjusted To :	\$170,000	\$120,000	\$80,000	\$293,283
02/22/90	Amount Adjusted To :	\$170,000	\$105,980	\$86,198	\$301,105
06/30/90	Contract Ended	\$170,000	\$105,980	\$86,198	\$301,105

Dallas County, Texas, Sheriff's Office

This OCN project initially involved the Dallas County, Texas, Sheriff's Office, the applicant agency, and the Dallas County District Attorney, Dallas Police Department, U.S. Drug Enforcement Administration, and the Fort Worth Police Department.

The project goal was to decrease the flow of illegal drugs into and through the Dallas/Fort Worth metroplex by targeting, investigating, and prosecuting individuals and organizations involved in high level narcotics distribution. Subsequent to the initial award, the Ft. Worth Police Department withdrew from the Control Group and the Duncanville Police Department was added.

DATE	ACTION	BASIC OCN	ADDITION TO BASIC	OPERATIONAL SUPPORT	FINANCIAL INVESTIGATIONS
12/01/87	Initial Contract :	\$170,000		\$80,000	
05/31/89	Component Added :		\$84,000		
08/01/89	Amount Adjusted To :	\$170,000	\$66,000	\$60,000	\$200,000
06/01/90	Amount Adjusted To :	\$170,000	\$41,000	\$35,000	\$125,000
06/30/90	Contract Ended	\$165,400	\$38,061	\$34,602	\$ 93,578

Utah Department of Public Safety

This OCN project set out as goals the identifying, investigating, and prosecuting of multi-kilo cocaine traffickers. Participating in the OCN project were the applicant agency, the Utah Department of Public Safety, along with the U.S. Drug Enforcement Administration, Federal Bureau of Investigation, Internal Revenue Service, Salt Lake City Police Department, Salt Lake County Sheriff's Office, and the U.S. Attorney's Office.

DATE	ACTION	BASIC OCN	ADDITION TO BASIC	OPERATIONAL SUPPORT
03/12/87	Initial Contract :	\$170,000		
11/30/87	Component Added :			\$80,000
03/30/89	Component Added :		\$60,000	
08/01/89	Amount Adjusted To :	\$170,000	\$50,000	\$60,000
06/30/90	Contract Ended	\$170,000	\$26,317	\$52,097

IV. Program Implementation Experience and Lessons Learned

The OCN Program has demonstrated during its limited period of operation that a shared management approach to drug investigations and prosecutions which develops multijurisdictional partnerships among law enforcement and prosecution, as well as local, state, and federal agencies, can be operationally effective, efficient, and successful. The cumulative OCN project operational results and outcomes presented previously in this monograph are certainly of significance, but perhaps even more important are the many strong interagency police and prosecutor relationships which were formed, for they are often difficult to achieve and contrary to tradition and experience.

Role of Self-Evaluation in Program Improvements

One of the features of the OCN Program has been the adoption of a continual self-evaluation process by the projects during their operation. Each project Control Group, with technical assistance from IIR, developed at the inception of the project goals and objectives which were designed to be comprehensible, attainable, observable, and measurable. A uniform data collection process was initiated at each site, and analysis of the information collected was centralized and automated. Assessments of project operational performance were routinely conducted as project implementation continued. Feedback was provided to project administrators and program and performance data was furnished to BJA to assist in program evaluation efforts.

Using this evaluative information, as well as the experiences and observations of their own agencies, Control Group members could constantly

monitor their project's accomplishments and make timely modifications. This process usually resulted in subtle, incremental corrections in enforcement strategies and operational management, but occasionally introspective analysis by a Control Group produced fundamental change.

Lessons Learned from Program Experience

In addition to the effects on individual projects, the self-evaluation process resulted in numerous findings which were applied Program-wide. These improvements and modifications were shared among the OCN projects during periodic national Program cluster conferences, through site visits by the technical assistance provider (IIR), and through production of a series of OCN-derived instructional videotapes. Lessons learned were also periodically incorporated into Program Guideline revisions to assist ongoing and future projects.

The remainder of this chapter describes these lessons learned from the implementation and operation of the OCN Program.

Target Selection

It is critical to the OCN Program success that, at the outset, project participants agree upon and describe offenses and offenders targeted for priority enforcement action. Although the individual participating agencies may have different threshold levels of criminal activity which qualify each agency's interest in a potential case, the participants must all work together as a team when setting the project's target interest levels.

BJA's OCN Program announcements and Guideline made frequent reference to "major" and "high-level" narcotics trafficking crimes as the Program

focus. As expressed in the OCN Program Guideline, the goal of the Program was clear: "to enhance the ability of local, state, and federal criminal justice agencies to remove **specifically targeted major narcotics trafficking conspiracies and offenders** through investigation, arrest, prosecution and conviction" (emphasis added).

It is apparent that the OCN Program was not designed to support street-level enforcement missions or merely to enhance basic intelligence collection. Beyond this, however, agencies applying for funding were given considerable latitude in describing the nature and level of the narcotics problem which they intended to attack. Initially, this description was presented in the preliminary application which was prepared for review by BJA.

In some of the preliminary applications, the initial description of the type and level of proposed investigative effort was very specific. In one joint project involving two state investigative agencies, for example, the targets were "individuals and/or organizations involved in clandestine drug manufacture, the distribution of illegally manufactured drugs, and other drug related crimes including outlaw motorcycle gangs, suppliers of chemicals and/or laboratory equipment, marketing and distribution groups and chemists." In some applications, not only the targeted crime problem but the enforcement method were quite specifically described. For example, the investigative agencies of four southern states planned to use portable radar sites to detect major aerial smugglers along the seacoasts of the participating states, and to coordinate joint interdiction efforts.

On the other hand, a number of applicants for funding described their targets in broad terms, such as "mid-level" or "high-level dealers." These applicant agencies and Control Groups were encouraged to refine these descriptions either during the application process or as a condition of receiving the award.

Generally, with minor modifications, the targeted crime problems remained constant throughout the life of a project. In a few instances subsequent analysis and operational performance assessment feedback resulted in the Control Group concluding that major change was warranted. The Control Group of a multi-state project, for example, found that after several months of operation they were unable to achieve their original, perhaps too-narrowly-focused, objective of disrupting the aerial smuggling of cocaine into the state. Accordingly, with BJA approval, the Control Group expanded the project's mission to include other smuggling modes and distribution conspiracies. Thus, when coupled with a clear description of projected operational targets, the self-evaluation process proved helpful not only in keeping the project on track, but in pointing out to the participants when a change in direction was needed.

Goals and Objectives

The formulation and expression of goals and objectives proved to be one of the more challenging administrative tasks undertaken by Control Groups. Many initial applications lacked specificity as to what was to be accomplished, and were subsequently revised to develop objectives which were measurable and observable. Samples of such objectives (see Appendix) were furnished to projects during the preliminary application phase, and further refinement took place as the Program progressed. At the time they applied for continuation funding, projects were required to evaluate their progress and make necessary adjustments to their goals and objectives.

Case Selection Criteria

BJA's OCN Program Guideline encouraged applicants to describe criteria by which the Control Group would select cases for funding. Some initial applications contained specific criteria. For instance, one project in the Southwest stated that selection was based at a minimum on the target organization or individual possessing the following traits:

- a. Multi-jurisdictional operation;
- b. At least three years of documented narcotics trafficking;
- c. Previously unsuccessful law enforcement targeting;
- d. Prior prosecution of individual group membership; and
- e. Organizational structure, as well as illicit activities continuing after prosecution, either without change or through in-house promotions.

Case selection criteria expressed by other applicants were often less focused. One project stated that they would "select likely candidates as targets from previous OCDETF intelligence." A number of applications did not contain case selection criteria and their formulation or refinement became a priority during the start-up phase of the project.

Generally, it was found that the earlier case selection criteria were formulated and in place, the sooner the project became operational. In some projects, Control Group representatives had discussed and agreed upon criteria in anticipation of multijurisdictional enforcement efforts, even before applying for OCN Program funding. In those instances their level of comfort with project operations seemed higher, and they were eager to initiate cases.

Several projects emphasized that they were planning on accepting case proposals from agencies that were not Control Group members. Here, well-defined

and publicized case selection criteria were especially desirable, so that outside agencies proposing cases for Control Group funding would know the type and level of case which was acceptable, and avoid any misunderstanding if a case was not approved. Irrespective of whether investigative proposals were presented to the Control Group from one of their member agencies or from outside, non-Control Group agencies, the benefit of having promulgated case selection criteria was found to be essential.

Interagency Agreements

The OCN Program Guideline required Control Group member agencies to execute a written Interagency Agreement as part of the application process. A proposed model agreement was included in the Guideline (see Appendix). It expressed the desire of the participants to work together on common problems and to contribute whatever resources they could to the joint effort. Participants were free to modify the model agreement, or come up with their own replacement.

The model Interagency Agreement was not intended to encompass issues related to liability, asset sharing, or other technical matters. Experience with the Program indicated that it was usually better to deal with these issues in separate agreements.

Few significant problems were encountered with the Interagency Agreement process, although it was found that when state and local agencies referred the agreement to their governmental legal advisors there was a tendency to add considerable protective language to the agreement. Although DEA's membership in the Control Group was required by the OCN Program announcement, most local

DEA offices elected to seek approval from DEA headquarters before signing the agreement.

The Control Group

Perhaps the most unique features of the OCN model are the Control Group decision-making and oversight processes. In a traditional task force organization, a "lead agency" is designated, usually reporting to a board of directors. Designation of a lead agency sometime results in serious friction or reduces the involvement of other participants to that of contributing resources to the lead agency, with the other participants having little impact on case management or operational activities. In such an arrangement, the board of directors, usually comprised of the administrators of the participating agencies, is often limited to establishing broad policies and strategies. The board is often chaired by the lead agency, which often appoints the task force commander as well.

In the OCN model, management and operational decision-making are shared. The OCN Control Group is comprised of a senior command representative from each of the participating agencies. The Control Group not only serves as a governing board which makes policy, but also selects cases to be investigated, allocates project resources, and jointly monitors OCN investigations.

Members of the OCN Control Group have an equal vote on all project matters, and all Control Group decisions must be unanimous. Day-to-day supervision of an OCN project case, once approved by the Control Group, lies with the individual lead agency selected by the Control Group for that investigation. In some projects, the Control Group deals with a single multijurisdictional task force,

while in other projects a number of ad hoc task forces may operate simultaneously and be monitored by the OCN Control Group.

One of the first organizational tasks of an OCN project is determining the composition of the Control Group. Other than the requirements that a state or local agency be the applicant for funding and a prosecutor and a DEA representative be members, no particular guidance was furnished applicants in determining Control Group membership. As the OCN Program gained experience, however, relevant organizational findings were disseminated by means of revisions to the Program Guideline, updated Program briefs, and on-site advice regarding Control Group composition.

The size of Control Groups varied from a minimum of three to a maximum of thirteen. Projects near the upper range in numbers of members tended to involve large, often sparsely populated geographic areas, or if located in a large metropolitan area, members of the Group were found to have lengthy prior agency associations and working relationships too important to be ignored in the new task force. Organizers were cautioned not to include agencies on the Control Group that were unable to substantially support and contribute to the OCN project effort. While certain political realities cannot be ignored, experience with the OCN Program indicates that the best results were achieved when Control Group membership was limited to agencies which had important resources to contribute to the joint effort.

The inclusion of more than seven members on a Control Group seemed to make decision-making cumbersome, and greatly increased the logistical obstacles to scheduling requisite meetings. Some Control Groups which originally had as many as twelve or thirteen members soon agreed to streamline.

It was difficult to drop a Control Group member without causing ill feelings. The most common solution was the creation of a smaller executive committee, or operations group, involving the agencies most likely to have continuing, primary operational roles in the OCN task force.

Another initial problem pertained to the organizational level of the agency designee who was going to represent their agency on the Control Group. Because many agencies had participated in previous cooperative, multijurisdictional efforts, including membership on task force boards of directors, there was a tendency to nominate the agency's chief executive to attend Control Group meetings. Over time it became apparent that the agency chief executives were usually too busy, too involved in extra-departmental business, or out of the operational and enforcement process to the point that they were not the most effective choice for the Control Group representative.

Generally, it was found that the agency representative on the Control Group should be an operational commander or staff person, albeit one with direct access to the highest command levels of the parent agency. The prosecutor's representative should be either principally involved in the prosecution of narcotics cases or directly supervising those who are. The Control Group representatives should be in the mainstream of the operations of their own agencies to the point that they need little updating on ongoing OCN project cases in which their agencies have the lead. The representatives should be able to commit their agencies' resources to a case without further approval, and not simply be a message carrier.

As Control Groups gained experience and confidence in the OCN Program, a self-leveling process took place in which agency chief executives relinquished their memberships on the Control Groups and were replaced with mid-level operational

commanders. Although they often attended Control Group meetings in advisory or informational capacities, there were few instances of line narcotics supervisors being designated as Control Group members.

An occasionally troublesome area was a tendency on the part of some Control Group agencies to substitute freely among their Control Group representatives. This interchange of representatives was most prevalent among prosecution agencies despite the critical need for consistency in legal advice and continuity in prosecution planning. Sometimes when substitution became a problem, other Control Group members expressed their concern to the agency head involved, most often with positive results.

The OCN Guideline intentionally offered no detailed advice as to Control Group meeting format, frequency, or location. In all cases, these formalities were decided early in the project start-up process, and modified over time. Control Groups were required to keep minutes of their meetings and make them available for review, as well as submit activity and progress reports on a quarterly basis.

Most Control Groups met frequently, but at least monthly in the early stages of project implementation. Some maintained that frequency throughout the project period, but most Groups met less frequently with the passage of time, and some Control Groups met only once a quarter. There was also a tendency to meet less frequently in those projects where the operational commanders serving on the Control Group were in almost continuous contact on their casework.

Most projects also established formal procedures for convening Control Group meetings by telephone to handle emergencies. Some projects found it difficult to schedule regular meetings among busy managers, and probably tended to

rely too heavily on conference calls. Other Groups set and adhered to a regular meeting schedule and rotated the meeting location among Control Group agencies.

Overall, OCN Program experience indicates that the functions of the Control Group were best exercised in a formal, in-person meeting on at least a monthly basis.

Case Planning and Monitoring

A major function of the Control Group is to determine whether proposed cases merit OCN project designation. Whether derived from ongoing cases by one or more of the participating agencies, or originating in agencies outside the Control Group, each case presented for consideration by the Control Group was required to be incorporated into a written case plan. The OCN Guideline contained a sample case plan which included as elements: target information; type and level of criminal activity; potential investigative impediments; proposed investigative actions; prosecution strategy deemed most conducive to success; personnel and equipment needed; and anticipated expenses (see Appendix). Most projects adopted the sample case plan without change.

The Control Group could either approve, disapprove, or defer action on a proposed case. Control Groups generally exercised these responsibilities conscientiously. During the life of nearly every project, cases were rejected as not meeting the project's criteria or deferred pending provision of additional information or intelligence. Control Groups were not reluctant to request additional information, offer advice, or amend proposed case budgets. Likewise, most Control Groups took their case monitoring and review responsibilities seriously and showed no hesitancy to suggest changes as cases progressed, or to

terminate investigations which were not fruitful. Amendments to case plans or budgets were processed with the same degree of formality as the original plans and budgets to ensure fairness to those whose plans may have been denied or who were awaiting requested funding.

Optional Components

Prior to the design of the OCN Program, a number of law enforcement practitioners indicated that a high-priority need for supplemental funding was personnel overtime costs. Agency heads and operational personnel consistently cited the lack of adequate overtime money as hampering joint investigations. Essentially the need for the funds was premised on the lack of trained personnel resources other than those already assigned to the OCN project, and the inability to recruit, train, and field new personnel within a practical timeframe. Thus, the Operational Support component was included in the OCN Program.

In practice assumptions about the need for and use of overtime money were generally borne out. There were some instances, however, where the availability of overtime funds became a problem rather than a solution, such as when grant overtime funds were provided to officers working on OCN project cases, but not to other investigators from the same agency working on non-OCN cases.

Financial Investigations Components

The Financial Investigations component of the OCN projects chiefly provided funding for salaries of financial investigators, their training, and equipment necessary to pursue these specialized investigations. At the outset of the OCN Program it was expected that the complex, long-term nature of financial

investigations and the need to carefully acquire and train suitable personnel, would result in a slower implementation process for the Financial Investigations components than for the Basic OCN components. Additionally, substantial asset forfeitures were not anticipated until the component had been operational for some time.

Some projects did experience difficulty in start-up, mainly due to delays in hiring qualified employees, or in some instances due to a paucity of candidates. Unwillingness of qualified personnel to risk joining a grant-funded activity and lengthy hiring procedures also caused delays. Agencies which had the ability to hire contract employees, exempt from civil service requirements, or which elected to use sworn officers as financial investigators, had a distinct initial start-up advantage.

Personnel regulations in some agencies required lengthy periods of vacancy announcement, advertising, and use of merit lists. Other agencies had no provision for speedy approval of new job descriptions and, to expedite hiring, used existing descriptions for positions perceived to be related. In one state agency, legislative approval for hiring grant employees had to be sought after the grant had been awarded. Several projects hired former federal financial investigators, including retirees, thus minimizing the need for extensive technical training - another distinct initial start-up advantage.

Despite these obstacles, most Financial Investigations components became operational rather quickly, and began producing substantive results, which was somewhat contrary to earlier expectations.

Appendix

**RECOMMENDED MODEL OBJECTIVES
FOR OCN PROJECT
SELF-EVALUATION CAPABILITY**

BASIC OCN

1. During the grant period, ___ (number of) formal meetings will be held by command level staff representatives of the control group.
2. During the grant period, ___ (number of) cases involving mid-to-upper-level drug conspirators will be presented to the control group for consideration as OCN investigations.
3. During the grand period, ___ (number of) cases will be approved by the control group for investigation.
4. Approved cases will include staff participation from at least two OCN project agencies in each investigation.
5. ___ (number of) cases approved for investigation will be completed with successful results. Arrests will occur in at least ___ % of the cases investigated.
6. The arrests occurring in approved project cases will result in at least ___ % guilty pleas or convictions on original or related charges of those arrested.
7. During the grant period, approved project cases will result in the seizure of at least ___ (grams, kilograms, ounces, pounds) of _____ (cocaine, crack, heroin, marijuana, hashish, amphetamine, other-specify).
8. Approved OCN cases will result in the forfeiture of property valued at \$ _____ (dollars) and \$ _____ (amount of currency).
9. An analysis will be made at the end of the grant period to assess the amount and percentage of funds expended for various purposes; e.g., for the purchase of evidence, surveillance activities, confidential source payments, etc.

10. (Other objectives as appropriate.)

OPERATIONAL SUPPORT

11. By the end of the grant period, at least ___ investigators from ___ project agencies will have carried out ___ overtime hours of physical surveillance and other investigative activity of suspected narcotics trafficking conspiracies approved for investigation by the control group.
12. The approximately ___ overtime hours of investigative activity will be carried out by the end of the grant period in at least ___ control group-approved investigations, at least ___ of which will result in arrest of or charges filed against alleged criminal conspirators.
13. (Other objectives as appropriate.)

FINVEST

14. During the grant period, ___ (number of) formal meetings will be held by command level staff representatives of the control group and ___ (number of) cases will be presented for consideration as Finvest cases.
15. During the grant period, ___ (number of) Finvest investigations will be approved by the control group for investigation.
16. Approved Finvest cases will include operational staff participation from at least two project agencies in each investigation.
17. By the end of the grant period at least ___ financial investigations will be successfully completed, as measured by the presentation of sufficient information to prosecutive agencies to initiate RICO, CCE, or other type of property seizure proceedings or criminal actions against defendants.
18. By the end of the grant period, ___ (number of) arrests will be made and as a result, ___% of guilty pleas and convictions will be obtained.

19. By the end of the grant period, at least ___ (number) investigations will be completed of narcotics related financial operations which will involve at least \$_____ million in assets tied to criminal activities.
20. At the end of the grant period, an analysis will be made to assess the amount and percentage of funds expended for various purposes; e.g., for personnel, purchase of services, purchase of evidence, contractual services, etc.
21. (Other objectives as appropriate.)

Sample Interagency Agreement
Between (Names of Participating Agencies)

This agreement between the participating agencies of the (Name of Project) shall be effective when signed by the Chief Executive Officers of the participating agencies.

1. It is agreed that each of the agencies will participate in a Control Group by designating one specific individual at the command level to serve on the Control Group and act on behalf of the designating agency. Each member of the Control Group shall have one vote and shall vote on:
 - Approval/disapproval of cases to be investigated as part of the project;
 - Amount of and use of funds to be authorized for specific case investigations; and
 - Key decisions critical to the management of case investigation strategies and activities.

All votes of the Control Group are unanimous.

2. Each agency agrees to provide whatever resources are available at their disposal to specific cases as appropriate for effective investigation of same, as approved by the Control Group.

3. It is agreed that participation in multi-agency investigative efforts of this project is voluntary and that in the event a participating agency wishes to withdraw from this agreement, written notification of this decision will be provided to all parties to this agreement prior to withdrawal.
4. Parties to this agreement shall cooperate with the project applicant agency in following procedures relating to case management, reporting requirements, fiscal guidelines, and other appropriate policies as adopted by the Control Group and as consistent with IIR and federal program guidelines.
5. (Other clauses or stipulations as desired.)
6. The term of this agreement shall be from (date contract entered with IIR) to (ending date of contract).

BY: (Chief Executive Officer of Each Agency)

Name
Title
Agency

_____ Date

BY: (Chief Executive Officer of Each Agency)

Name
Title
Agency

_____ Date

etc., as needed.

SAMPLE CASE PLAN*

ELEMENTS:

I. Background and Summary of Case

II. Target(s) of Case

A. Name

B. Detailed identification information

III. Need for Joint Jurisdiction

- What laws are possibly being violated that require a multi-agency effort?

IV. Operational Plan

- What specific investigative actions and prosecutive steps will be involved in pursuing the case?

V. Participating Agencies

A. Personnel - financial specialists, prosecutors, etc.

B. Other resources - equipment, vehicles

VI. Anticipated Expenses (Use the expense categories in the approved budget to estimate case expenditures and show basis for calculation, e.g. manhours estimate, travel expense.)

- * Minutes of Control Group meetings should reflect case approval and a control number for tracking case.