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A Review of the Department's Anti-Gang Intelligence and Coordination Centers

November 2009

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EXECUTIVE DIGEST

Gangs pose a serious threat to public safety throughout the United States. Gang membership and gang-related criminal activity has increased over the past 10 years, and gang violence is making increased demands on law enforcement resources in many communities. Experts predict that these trends will continue as gang-operated criminal networks expand. As of September 2008, there were an estimated 1 million gang members – an increase of 200,000 since 2005 – belonging to over 20,000 gangs that were criminally active within the United States.[1]

According to the 2009 National Gang Threat Assessment, criminal gangs commit as much as 80 percent of the crime in many communities.[2] In addition, a number of U.S.-based gangs are working with foreign-based gangs and criminal operations to facilitate transnational criminal activities. Typical gang-related activities include alien smuggling, armed robbery, assault, auto theft, drug trafficking, extortion, fraud, home invasions, identity theft, murder, and weapons trafficking.

The Department of Justice (Department) has stated that it is leading the effort to combat the public safety threat posed by national and international gangs. Its anti-gang strategy is intended to achieve "maximum impact at the national level against the most violent gangs in the United States."[3]

In January 2007, Attorney General Alberto Gonzales announced that the Department had taken several steps to address gang violence. Among those efforts were the establishment of three new entities: (1) the National Gang Intelligence Center (NGIC), which was established by statute in January 2006, integrates the gang intelligence assets of all DOJ agencies and other partner agencies; (2) the National Gang Targeting, Enforcement, and Coordination Center (GangTECC), established in June 2006 by the Attorney General, serves as a central coordinating center for multi-jurisdictional gang investigations; and (3) the Gang Unit, another Attorney General initiative created in September 2006, develops and implements strategies to attack the most significant gangs

[1] National Gang Intelligence Center and National Drug Intelligence Center, *2009 National Gang Threat Assessment,* November 2008, iii, 6.

[2] *2009 National Gang Threat Assessment,* iii.

[3] Department of Justice Fact Sheet: *The National Gang Intelligence Center and the National Gang Targeting, Enforcement, and Coordination Center*, November 28, 2007.

and serves as the prosecutorial arm of the Department's efforts against violent gangs.

The Office of the Inspector General (OIG) conducted this review to examine the intelligence and coordination activities of NGIC and GangTECC (the Centers), and to assess the effectiveness of their contributions to the Department's anti-gang initiatives.[4] Specifically, we examined whether the Centers provide comprehensive gang intelligence and coordination services to enhance gang investigations and prosecutions in the field. In addition, we assessed the effectiveness of the Department's management and co-location of the Centers.

National Gang Intelligence Center (NGIC)

NGIC was established by statute in January 2006 to "collect, analyze, and disseminate gang activity information" from various federal, state, and local law enforcement, prosecutorial, and corrections agencies.[5] The Federal Bureau of Investigation (FBI) used existing resources from its Criminal Intelligence Section to establish NGIC. The public law that established NGIC also charged the FBI with administering NGIC as a multi-agency center where intelligence analysts from federal, state, and local law enforcement work together to develop and share gang-related information. NGIC was to provide a centralized intelligence resource for gang information and analytical support to law enforcement agencies. For fiscal year (FY) 2008, NGIC's budget was $6.6 million and, as of June 2009 there were a total of 27 staff at the NGIC.

Gang Targeting, Enforcement, and Coordinating Center (GangTECC)

On February 15, 2006, Attorney General Gonzales announced plans to create a new national anti-gang task force as part of an initiative to combat gangs and gang violence. On June 26, 2006, GangTECC began operations under the leadership of the Department's Criminal Division. Its mission is to bring together the Department's operational law enforcement components and the Department of Homeland Security's Immigration and Customs Enforcement (ICE) to identify, prioritize, and target violent street gangs whose activities pose a significant multi-jurisdictional threat. According to its Concept of Operations, GangTECC is intended to coordinate overlapping investigations, ensure that tactical and strategic intelligence is shared between law enforcement agencies, and serve as a central coordinating and deconfliction center. Unlike NGIC, GangTECC is not authorized a separate

[4] We use the term "Centers" when referring to NGIC and GangTECC.

[5] 28 U.S.C. 534 note (2006).

budget by statute. Instead, costs are borne by the contributing agencies. As of early 2009, there were a total of 17 GangTECC staff members.

RESULTS IN BRIEF

Our review found that, after almost 3 years of operation, NGIC and GangTECC still have not made a significant impact on the Department's anti-gang activities. Despite being located in the same office suite, both NGIC and GangTECC are not effectively collaborating and are not sharing gang-related information.

Most importantly, NGIC has not established a gang information database for collecting and disseminating gang intelligence as directed by statute. NGIC is perceived as predominately an FBI organization, and it has not developed the capability to effectively share gang intelligence and information with other law enforcement organizations.

In contrast, we found that GangTECC has no budget and lacks the resources to carry out its mission. We also found that the Criminal Division has not filled an attorney position at GangTECC that is intended to enable it to provide guidance to law enforcement officials conducting gang investigations and prosecutions. In addition, because GangTECC's member agencies and the United States Attorneys' Offices (USAO) are not required to inform GangTECC of their investigations and prosecutions, GangTECC cannot effectively deconflict the Department's gang-related activities as directed by the Deputy Attorney General. Further, GangTECC's efforts to publicize its priority gang targets have lagged.

As a result of the above, NGIC and GangTECC are not effectively providing investigators and prosecutors with "one-stop shopping" for gang information and assistance, and they are not contributing significantly to the Department's anti-gang initiatives.

The following sections of this Executive Digest describe our findings in these areas.

NGIC has not developed a gang information database as directed by Congress.

In funding NGIC, Congress directed that NGIC was to, among other things, serve as an "information management mechanism for gang intelligence

on a national and international scope."[6] To accomplish this, NGIC planned to create and maintain a library of gang identification information and make that library available to investigators, prosecutors, and other law enforcement staff. In addition, NGIC planned to establish electronic bridges to federal, state, and local information technology systems to connect disparate federal and state databases containing gang information or intelligence.

However, technological limitations and operational problems have inhibited NGIC from deploying a gang information database. For example, NGIC has not developed the electronic bridges necessary to allow it to access information from states that have technologically disparate databases on gangs.[7] In addition, performance issues with a contractor contributed to the delay in the development of the gang library. As of July 2009, the information management system and electronic bridges have not progressed beyond the development phase. Unless NGIC can obtain a technical solution for bridging these databases, NGIC's ability to use existing gang information will be very limited.

We believe that development of a gang information management system is crucial to support the Department's anti-gang initiatives and must be achieved as soon as possible. Therefore, we recommend that:

1. NGIC establish a working group composed of representatives from its member agencies and state and local law enforcement to identify methods for sharing gang-related intelligence across the law enforcement community. This working group should address, among other issues: (a) a definition of "gang" and criteria for identifying gang membership; and (b) data standards for entering gang information into databases.

2. NGIC create an implementation plan that identifies functional requirements with milestone dates to procure a gang information management system.

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[6] Conference Report, *Making Appropriations for Foreign Operations, Export Financing, and Related Programs for the Fiscal Year Ending September 30, 2005, and For Other Purposes*, November 19, 2004, H. Rept. 108-792.

[7] For example, California, Colorado, Florida, Illinois, Minnesota, South Carolina, Texas, Washington, and Wisconsin are some of the states that have gang databases of varying types and sizes.

NGIC is not effectively sharing gang intelligence and information.

To effectively share gang intelligence and information, NGIC must know the needs of the law enforcement personnel who are its customers and ensure they are aware of the NGIC's capability to support their gang-related investigations and prosecutions. We analyzed NGIC's Request for Information workload to identify patterns or trends in the customers who are submitting requests and the types of assistance that they are requesting.[8] We found that from January 1, 2006, to February 19, 2009, NGIC received requests for assistance from 18 customer groups for 16 types of information.

We found that NGIC has few regular users outside of the FBI, GangTECC, and itself. These three organizations accounted for 64 percent of all requests received by NGIC. The remaining 36 percent of the requests were distributed among 15 other customer groups. With respect to the "state, local, and tribal law enforcement" customer group, our analysis showed that few requests came from these potential customers. This customer group encompasses the majority of law enforcement agencies and personnel in the United States – over 30,000 agencies and 700,000 sworn officers – and has the greatest interactions with criminally active gangs in the United States. Yet, despite its large size, this customer group made an average of only 3 requests per year and submitted only 13 of the 213 total requests for information received by NGIC from its inception in 2006 to February 2009.

The following table illustrates NGIC's top customers and the number of requests for information made by these customers.

[8] A Request for Information is NGIC's term for its customers' inquiries and requests for assistance from the Center's analysts. NGIC creates a Request for Information each time it receives a query from a customer by e-mail, telephone, or in person.

Table 1: NGIC Top Five Customers

Customer Group	Fiscal Year[a]					Total
	2006	2007	2008	2009	Unknown Date	
FBI	14	4	20	26	7	71
GangTECC	0	0	31	16	0	47
NGIC	0	0	0	18	0	18
State, Local, and Tribal Law Enforcement	3	0	7	3	0	13
El Paso Intelligence Center (EPIC)[b]	0	1	6	1	0	8
Total	17	5	64	64	7	157

[a] Two of the fiscal years in this table are partial years. FY 2006 covers the period January 1, 2006 to September 30, 2006, and FY 2009 covers the period October 1, 2008 to February 19, 2009.

[b] EPIC is a multi-agency intelligence center that collects and disseminates information related to drug, alien, and weapon smuggling in support of field enforcement entities throughout the southwest region of the United States.

Source: NGIC.

In discussions with the NGIC and GangTECC personnel and other law enforcement officials about why NGIC was not used more frequently by law enforcement agencies, we found that NGIC was not perceived as an independent, multi-agency center by many of the law enforcement personnel we interviewed. It was repeatedly referred to as being "FBI-centric" in the products it generates and the intelligence analysis that it provides.

We also found that, in the 38-month period we examined, NGIC responded to only about six requests a month. While this increased to about 17 requests a month in the first 5 months of FY 2009, that number is still small given NGIC's staffing of 20 intelligence analysts. NGIC management attributed the small number of requests to the law enforcement community's unfamiliarity with NGIC – despite the Center's attempts to advertise its presence – and to NGIC personnel not recording all the requests they received.

Although GangTECC's operational guidance states that it is intended to be a major user of NGIC's gang intelligence services, its use remains limited. We spoke with 12 GangTECC personnel about the kind of assistance they might need from NGIC. Six members stated that GangTECC needs case support for the investigations it coordinates, but they believe NGIC is more oriented toward providing intelligence products. Some NGIC personnel also

agreed that there was a benefit to NGIC analysts providing case support to GangTECC. We found that when NGIC analysts have provided case support to GangTECC, results have been favorable.

We also found that while customer satisfaction surveys are routinely distributed asking customers to rate NGIC intelligence products for quality and value factors and to provide comments, NGIC is not using the results from these surveys to assess its performance. By not analyzing these customer comments, NGIC is missing an opportunity to more appropriately tailor its products to meet the needs of its customers.

Finally, in our interviews, the OIG found that NGIC's intelligence products are of limited usefulness to GangTECC personnel for their work. Some GangTECC personnel expressed the opinion that NGIC intelligence products were written only by the FBI representatives at NGIC and that the products therefore reflected only the FBI's data. In addition, one NGIC analyst told the OIG that NGIC intelligence analysts were "writing history" rather than producing leads that can be acted on. Some NGIC personnel were also concerned about the length of time it took to disseminate their intelligence products.

We believe that the absence of a monitoring process to assess NGIC's customer satisfaction with products and services reduces NGIC's ability to share relevant gang-related information and provide useful support to law enforcement personnel who are conducting gang investigations and prosecutions. We recommend that:

3. NGIC analyze the responses to past customer surveys on intelligence products to identify improvements that would make its intelligence products more useful to customers.

4. NGIC expand its customer satisfaction surveys to include recipients of all of its products and services.

5. NGIC analyze the types of information being requested and the time spent responding to each request type to better allocate its resources.

6. NGIC track all requests for information that it receives.

GangTECC has insufficient resources to carry out its mission of coordinating gang investigations and prosecutions.

GangTECC has a broad, multi-purpose mission, but only 12 members and no operating budget. Participating components are required to contribute staff to GangTECC and pay their salaries out of their own budgets. The lack of an operating budget has prevented GangTECC managers from taking actions essential to its operations, including hosting case coordination meetings and conducting effective outreach to the law enforcement community. Almost all GangTECC members we interviewed, as well as the GangTECC Director and Criminal Division officials, stressed that the lack of an operating budget is the biggest hindrance for GangTECC, particularly when it prevents the GangTECC personnel from fully participating in case coordination meetings.

Coordination efforts. Organizing and participating in case coordination meetings is central to GangTECC's mission to identify common targets between law enforcement agencies. GangTECC identifies opportunities to coordinate gang investigations with multiple law enforcement agencies and attempts to organize case coordination meetings to bring together federal, state, and local investigators, analysts, and prosecutors to share information. Successfully coordinated cases may enable charges to be brought against large, geographically dispersed gang-related criminal enterprises.

GangTECC has coordinated 12 cases that involved multiple law enforcement agencies and jurisdictions, and these efforts resulted in better, stronger cases for prosecution. GangTECC has also facilitated cooperation and coordination in over 100 other cases in which investigators or agencies would not initially share information on common targets with one another. Law enforcement personnel we interviewed who used the GangTECC's services reported high levels of satisfaction and told us that case coordination was the most helpful service that GangTECC could provide to the field.

Notwithstanding the demonstrated value, the GangTECC Director told us there have been at least five occasions when GangTECC has been unable to host or even attend out-of-state case coordination meetings because it was unable to fund travel costs. For example, GangTECC could not host case coordination meetings for two cases involving the Latin Kings gang. As a result of the limitations on GangTECC's ability to execute its mission, opportunities to better coordinate the Department's efforts to combat gang crime have been lost.

Outreach. Despite GangTECC's efforts, the lack of a budget has prevented GangTECC from adequately advertising its services. Among other things, GangTECC is unable to sponsor field training, routinely attend conferences of gang investigators, or provide materials at those conferences.

Communications. Lack of a budget also hampers GangTECC's internal and external communications. GangTECC members cannot e-mail documents to each other or collectively store and track information on a shared drive. Rather, GangTECC members have been manually tracking the assistance they provide in logbooks. Also, without a dedicated server of its own, GangTECC cannot assign unique e-mail addresses for its members to use for customer contacts. Instead, members use the e-mail addresses from their parent agencies.

GangTECC lacks critical staff to provide guidance on gang investigations.

Another resource issue for GangTECC is that the Criminal Division has not assigned prosecutors to work with GangTECC. GangTECC's Concept of Operations states that, in addition to the Criminal Division attorneys initially assigned to GangTECC, "it is anticipated that the Gang Unit prosecutors will work closely with GangTECC." Although the GangTECC Director told the OIG that the Center's relationship with the Gang Unit has improved since the summer of 2008, we found that Gang Unit attorneys still do not typically spend time at GangTECC or attend any of GangTECC's working meetings. Furthermore, the two units occasionally have competing priorities with respect to gang investigations. We believe that establishing written protocols to mandate cooperation and coordination as envisioned for GangTECC and the Gang Unit would diminish conflict and increase cooperation between the two entities.

In addition, the Criminal Division has not assigned an attorney to serve as a liaison between GangTECC and the USAOs, which limits GangTECC's ability to coordinate with USAOs nationwide. Knowledge of USAO gang caseloads and strategies would assist GangTECC and, more importantly, the Department with case coordination and enhancement of gang-related investigations and prosecutions. In addition, without the presence of an attorney knowledgeable about gang investigations and prosecutions, it is more difficult for GangTECC to resolve conflicts between different jurisdictions and agencies.

We concluded that, if the Department continues to view national anti-gang efforts as a priority and GangTECC as the best way to coordinate multi-agency anti-gang investigations and prosecutions, it must dedicate sufficient resources to GangTECC to allow it to achieve its mission. Therefore, we recommend that:

7. The Department request a separate operating budget for GangTECC.

8. The Criminal Division assign and locate at GangTECC at least one full-time experienced prosecutor, as discussed in GangTECC's Concept of Operations.

9. The Criminal Division and Governing Board direct GangTECC and the Gang Unit to jointly develop written protocols addressing: (a) how often and under what conditions GangTECC and the Gang Unit should meet to share information on gang-related cases; (b) what gang-related information should be regularly shared between the two entities; (c) criteria for GangTECC to follow in referring gang cases to the Gang Unit; and (d) a method for determining which component will coordinate directly with the field office and district USAO.

Deconfliction by GangTECC is not occurring as directed by the Deputy Attorney General.

Over its 3-year existence, GangTECC has not established itself as the central coordination and deconfliction center envisioned by its Concept of Operations.[9] Although it was intended that GangTECC would "provide a strong, national deconfliction center for gang operations," neither GangTECC's own participating components nor USAOs are required to notify GangTECC of newly opened gang cases. Consequently, GangTECC cannot effectively deconflict the Department's anti-gang activities on a national level.

In the absence of a Department-wide requirement to notify GangTECC of anti-gang activities, GangTECC began a pilot project with NGIC in November 2008 to deconflict newly opened gang cases. GangTECC members used databases from their respective agencies to query newly opened gang cases and compiled a list of subject names related to each case. NGIC analysts then manually checked those names against the names of targets in four different member components' databases to identify potential overlapping investigations. For example, for the FBI the initial pilot project examined over 500 subjects identified in FBI-initiated cases and found 38 who were also under investigation by another component. However, the manual process proved to be too labor- intensive and the pilot project was suspended in April 2009.

Nonetheless, GangTECC's pilot deconfliction project demonstrated the need for deconflicting gang investigations. The OIG believes a process that requires newly opened gang-related investigations to be reported to GangTECC would require a minimum investment of resources while improving coordination of multi-jurisdictional gang investigations. We recommend that:

[9] The deconfliction process is intended to identify overlapping investigations to prevent resources being wasted on redundant activities.

10. The Department require all participating GangTECC members report every newly opened gang-related investigation to GangTECC at the time the component opens the case.

11. The Department direct that each USAO notify GangTECC of each newly opened gang case immediately upon opening the case.

GangTECC's efforts to publicize priority gang targets have lagged.

GangTECC is required to use information from NGIC and other sources to identify priority targets and propose strategies to neutralize the most violent and significant gang threats. According to the GangTECC Director, GangTECC and NGIC first identified 13 priority gang targets in 2006. However, we found little evidence during our review that the list was used outside the two Centers.

In September 2008, GangTECC began to develop its Targeting Prioritization Project in an effort to update the original list of 13 priority targets. Using information from the 2009 National Gang Threat Assessment, GangTECC completed its initial assessment in February 2009 which included the identification of 17 priority gang targets. That information could be used as a guide for law enforcement to focus resources, but, as of September 2009, GangTECC had not released that information to the field. While the GangTECC Director told us that he would like to identify priority targets on an annual basis, GangTECC does not have a method for collecting the necessary gang data from law enforcement agencies.

GangTECC has developed a strategy to use information from Federal Bureau of Prisons' (BOP) databases to better target individuals who communicate with federal inmates and may be involved in suspicious activity such as multiple inmates who are classified in a Security Threat Group that receive money from the same person.[10] If criminal activity is suspected, GangTECC investigators review the case and a formal referral package is sent to the agencies involved.

According to the GangTECC Director, this is significant because 4 of the 17 priority gang targets that GangTECC identified are prison gangs. However, GangTECC has yet to develop strategies to address the remaining 13 priority gang targets.

[10] Inmates classified in Security Threat Groups include individuals such as street gang members, suspected terrorists, and known bomb experts.

GangTECC's ability to accomplish its targeting mission is also hampered because it has no analytical staff, only investigators. Without analysts, GangTECC cannot independently conduct the analysis required to identify priority targets, detect patterns that may be exploited by investigators and prosecutors, or create strategic and tactical products for the field. NGIC's operational plans require it to provide this analytical assistance to GangTECC, but we found the assistance only occurred on a limited basis. We recommend that:

12. GangTECC and NGIC (a) immediately disseminate information on the 17 gangs that they have identified as posing the greatest threat, and (b) develop a plan for periodically updating and disseminating information on high-threat gangs.

13. GangTECC and NGIC develop law enforcement strategies and initiatives to address the additional identified priority targets.

14. GangTECC and NGIC increase the use of NGIC's analytical resources to support GangTECC's targeting mission.

NGIC and GangTECC are not effective as independent entities.

NGIC and GangTECC's operational plans required them to co-locate so that they would establish a relationship in which the resources of each Center would be integrated with and fully utilized by the other. An effective NGIC and GangTECC partnership would include deconfliction, identification of priority gang targets, and sharing of gang information. While the Centers are located in the same office suite in the same building, this co-location of NGIC and GangTECC did not lead to the anticipated partnership. Our discussions with NGIC and GangTECC personnel regarding their interactions found that communication between the two Centers remains limited and ad hoc.

In addition, while both NGIC and GangTECC advertise at conferences and in their pamphlets that they provide investigators and prosecutors with a "one-stop shopping" capability for gang information and assistance, this capability has not been achieved due to various impediments. NGIC is administered by the FBI while GangTECC is administered by the Criminal Division. We found that differing leadership and management philosophies, funding sources (dedicated funding versus funding through contributions by member agencies), and investigative priorities have limited the Centers' ability to work together effectively.

We believe that the Department should consider merging NGIC and GangTECC into a single unit under common leadership. Merging the Centers

could improve their ability to support and coordinate the Department's anti-gang initiatives at a national level by reducing incompatibilities that result from the current organizational alignment, creating a better joint operating environment, and providing for a more reliable resource stream to support the Centers' mission. Therefore, we recommend that:

15. The Department consider merging NGIC and GangTECC.

CONCLUSIONS

NGIC and GangTECC were created to be the Department's national intelligence and coordination mechanisms for gang-related investigations and prosecutions. However, we found that after more than 3 years, the Centers have not significantly improved the coordination and execution of the Department's anti-gang initiatives. Despite being co-located to facilitate interagency cooperation, they are not effectively working together, which has hindered their ability to make a significant impact on the Department's anti-gang activities.

Most importantly, because of performance issues with a contractor and technological challenges associated with establishing electronic bridges between disparate state and local databases, NGIC has not established a gang information database for collecting and disseminating gang intelligence as directed by Congress.

Furthermore, NGIC is perceived as predominately an FBI organization that does not effectively share gang intelligence and information with other law enforcement organizations. Overall, in the 38-month period we examined NGIC received only 213 requests for information - about 6 requests a month. Moreover, the preponderance of FBI and internal requests suggests that the NGIC remains primarily focused on FBI investigations and has not become the national resource on gang intelligence for federal, state, and local law enforcement as envisioned. Also, NGIC's customers report that NGIC's intelligence products have limited usefulness.

In addition, because components and USAOs are not required to inform GangTECC of their investigations and prosecutions, GangTECC cannot effectively deconflict the Department's gang-related activities as directed by the Deputy Attorney General. Also, the Criminal Division has not filled an attorney position intended to enable GangTECC to provide guidance to law enforcement officials conducting gang investigations and prosecutions. Although GangTECC has a broad, multi-purpose mission, it has no operating budget. This has prevented GangTECC managers from taking actions essential to

GangTECC operations, such as hosting case coordination meetings and conducting effective outreach to the law enforcement community.

We also found that, although the Centers were co-located to facilitate interagency cooperation and gang-related information sharing, NGIC and GangTECC have made only limited use of each other's resources. Furthermore, communication between the two Centers' personnel occurs only on an ad hoc basis.

Because co-location of the Centers has proven insufficient to ensure that collaboration between the Centers occurs, the OIG's primary recommendation is that the Department consider merging NGIC and GangTECC into a single unit under common leadership. This action could improve the Centers' ability to support and coordinate the Department's anti-gang initiatives at a national level. Merging the Centers could reduce incompatibilities that result from the current organizational alignment, create a better joint operating environment, and provide for a more reliable resource stream to support the Centers' missions.

While we believe that merging the Centers would improve their ability to assist gang investigations and prosecutions, merger alone is insufficient to support the Department's anti-gang initiatives. Major improvements are needed in the areas discussed in this report if the Centers are to effectively coordinate and support gang investigators and prosecutors nationwide. We therefore make 15 recommendations to help improve NGIC's and GangTECC's missions of assisting federal, state, and local law enforcement to address violent regional and national gangs.

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BACKGROUND

Introduction

Gangs pose a serious threat to public safety throughout the United States. Gang membership and gang-related criminal activity have increased over the past 10 years, and gang violence is requiring significant law enforcement attention in many communities. Experts predict that these trends will continue as gang-operated criminal networks expand. As of September 2008, there were an estimated 1 million gang members – an increase of 200,000 since 2005 – belonging to over 20,000 gangs that were criminally active within the United States.[11]

Neighborhood-based street gangs account for the majority of criminally active gangs in the United States, with approximately 900,000 gang members living in local communities nationwide and about 147,000 in prisons or jails. The 2009 National Gang Threat Assessment said that gang members are continuing to migrate from urban areas to suburban and rural communities, thus expanding the gangs' influence in those regions. According to the Assessment, the percentage of U.S. law enforcement agencies reporting gang activities within their jurisdictions increased from 45 percent in 2004 to 58 percent in 2008.

In addition, the Assessment stated that criminal gangs commit as much as 80 percent of the crime in many communities.[12] Typical gang-related activities include alien smuggling, armed robbery, assault, auto theft, drug trafficking, extortion, fraud, home invasion, identity theft, murder, and weapons trafficking. In addition, some U.S.-based gangs are working with foreign-based gangs to facilitate criminal activities.

The Department of Justice (Department) is combating the public safety threat posed by national and international gangs with an anti-gang strategy intended to achieve "maximum impact at the national level against the most violent gangs in this country."[13] In January 2007, the Attorney General announced that the Department had taken several steps to address gang violence, including the establishment of three new entities: (1) the National

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[11] National Gang Intelligence Center and National Drug Intelligence Center, *2009 National Gang Threat Assessment*, November 2008, iii, 6.

[12] *2009 National Gang Threat Assessment,* iii.

[13] Department of Justice Fact Sheet: *The National Gang Intelligence Center and the National Gang Targeting, Enforcement and Coordination Center*, November 28, 2007.

Gang Intelligence Center (NGIC), established by statute, integrates the gang intelligence assets of all DOJ agencies and other partner agencies; (2) the National Gang Targeting, Enforcement, and Coordination Center (GangTECC), an Attorney General initiative, serves as a central coordinating center for multi-jurisdictional gang investigations; and (3) the Gang Unit, also an Attorney General initiative, develops and implements strategies to attack the most significant gangs and serves as the prosecutorial arm of the Department's efforts against violent gangs.[14]

According to the Department's Strategic Plan for fiscal years (FY) 2007 to 2012, the partnership between NGIC and GangTECC is one of the strategies intended to address the prevalence of gangs and gang violence. In addition, the Department co-located NGIC and GangTECC at a facility in Northern Virginia in an attempt to facilitate interagency cooperation and to enhance gang-related information sharing among federal, state, local, and tribal governments and law enforcement agencies.[15]

A joint NGIC and GangTECC publication described the partnership of the two Centers as a means to provide investigators and prosecutors with "one-stop shopping" for gang information and assistance. The combination of NGIC's intelligence capability with GangTECC's coordination and targeting function is also intended to provide federal, state, and local law enforcement with access to nationwide intelligence and coordination of gang crime investigations bringing together intelligence analysts, law enforcement agents, and prosecutors to "attack the problems caused by gangs and gang-related violence at all ends."[16] For example, investigators and prosecutors would be able to use the nationwide databases of participating agencies to get information on individual gang members, the relationships between gang members, gang structures, and criminal activities.

Purpose

The Office of the Inspector General (OIG) review examined the intelligence and coordination activities of NGIC and GangTECC, and assessed the

[14] We use the term "Centers" when referring to NGIC and GangTECC.

[15] The Gang Unit has designated workspace in the same office suite shared by NGIC and GangTECC in Northern Virginia but its staff primarily works at Criminal Division offices in Washington, D.C.

[16] Department of Justice Fact Sheet: *The National Gang Intelligence Center and the National Gang Targeting, Enforcement and Coordination Center*, November 28, 2007.

effectiveness of their contributions to the Department's anti-gang initiatives.[17] Specifically, we examined whether each organization provided comprehensive gang intelligence and coordination services to enhance gang investigations and prosecutions in the field. In addition, we assessed the effectiveness of the Department's management and co-location of the Centers.

Scope

We conducted our fieldwork from July 2008 through April 2009. We examined NGIC's operations from January 2006 through April 2009 (NGIC's establishment to the end of fieldwork) and GangTECC's programs and activities from June 2006 through April 2009 (GangTECC's establishment to the end of fieldwork).

A detailed description of our methodology is contained in Appendix I.

NGIC

NGIC was established by statute in January 2006 to "collect, analyze, and disseminate gang activity information" from various federal, state, and local law enforcement, prosecutorial, and corrections agencies.[18] NGIC initially was formed from an existing gang unit within the Criminal Intelligence Section at the Federal Bureau of Investigation (FBI).[19] NGIC's mission is to provide a centralized intelligence resource for gang information and analytical support to law enforcement organizations. The FBI administers NGIC as a multi-agency center where intelligence analysts from federal, state, and local law enforcement work together to develop and share gang-related information. As of June 2009, NGIC had 27 staff.

In FY 2005, the year NGIC was established, its budget was $1.7 million. In FYs 2006 through 2009, the NGIC budget ranged from $6.6 million to $6.8 million per year (Table 2).

[17] Our review does not examine the specific activities of the Criminal Division's Gang Unit.

[18] 28 U.S.C. 534 note (2006)

[19] The FBI converted existing resources from its Americas Criminal Enterprise/Violent Crimes Intelligence Unit to establish NGIC.

Table 2: NGIC Budget, FY 2005 Through FY 2009 (in Millions)

	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009
NGIC Budget	$1.7	$6.8	$6.8	$6.6	$6.6

Source: NGIC FY 2007 – FY 2014 Spend Plan.

According to its Concept of Operations (see Appendix III), NGIC's mission is to:

> support law enforcement agencies through timely and accurate information sharing and strategic/tactical analysis of federal, state, local, and tribal law enforcement intelligence focusing on the growth, migration, criminal activities, and associations of gangs that pose a significant threat to communities throughout the United States.

The NGIC Concept of Operations established the following specific goals for NGIC to accomplish its mission:

1. Establish and maintain an FBI-facilitated multi-agency NGIC.
2. Research, acquire, and implement technology to manage the exchange of gang information among federal, state, local, and tribal law enforcement agencies.
3. Provide the law enforcement community with a "one-stop shop" mechanism for quick-checks or data calls to support law enforcement requests for information regarding suspected or known gangs and/or gang members.
4. Conduct timely research and analysis which seeks to identify and neutralize emerging trends of the most violent gangs.
5. Provide analytic support to law enforcement investigations, operational/intelligence initiatives, and issues of immediate concern.
6. Provide intelligence support for GangTECC and other law enforcement agencies to deconflict and coordinate gang related investigations and prosecutions.
7. Develop and maintain strong partner and customer relations to maximize analytical and information exchange efforts.

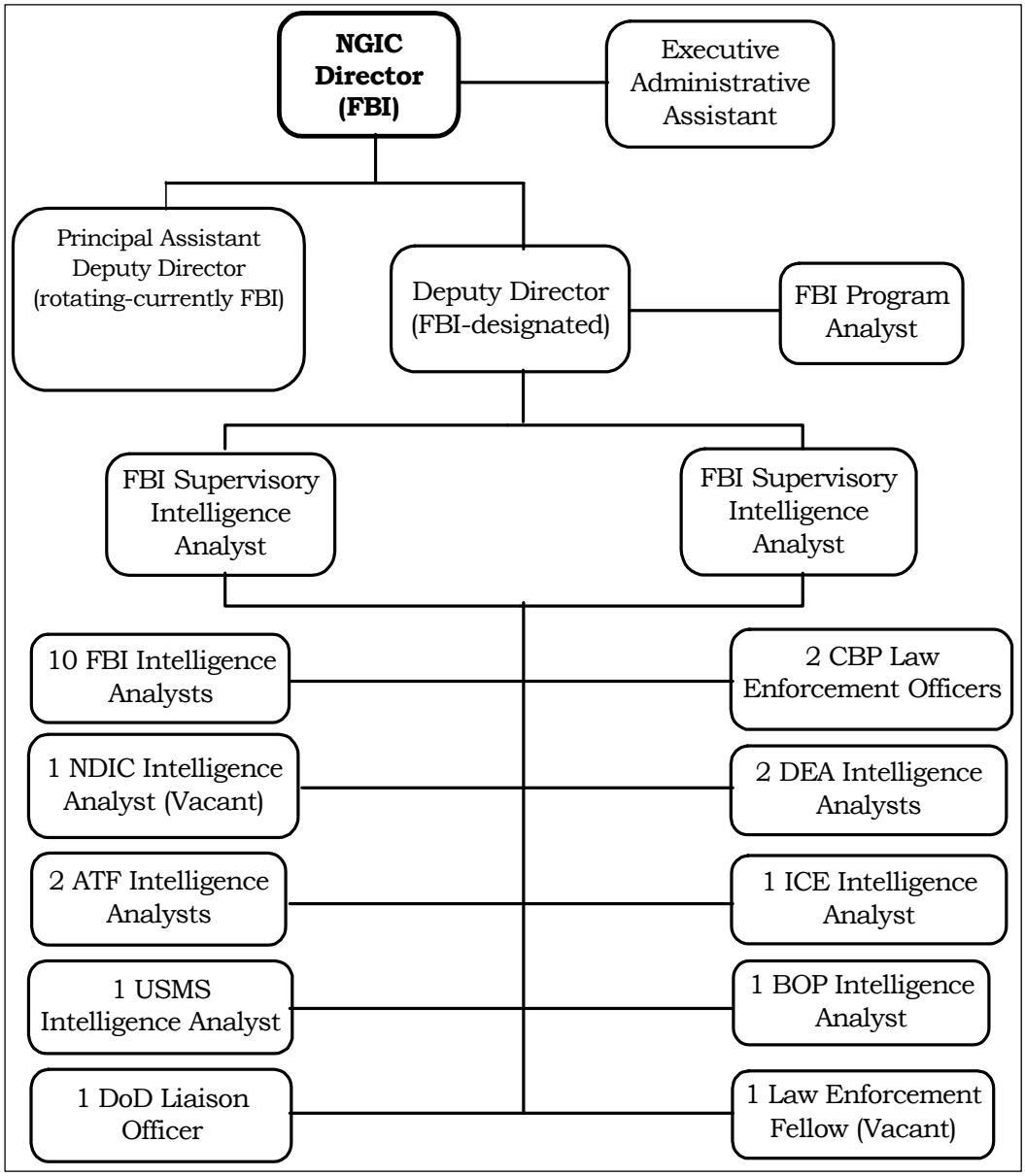
NGIC Organization

The NGIC Director position is designated as an FBI position and is filled by a Special Agent who reports to the Section Chief of the Gang/Criminal Enterprise Section at the FBI, which is within the FBI's Criminal Investigative Division. Of the two NGIC Deputy Director positions, one is permanently designated as an FBI intelligence analyst position, while the other is rotated among the agencies represented in the NGIC membership.[20]

Agencies that currently contribute staff members to NGIC include the FBI; Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF); Drug Enforcement Administration (DEA); Federal Bureau of Prisons (BOP); National Drug Intelligence Center (NDIC); United States Marshals Service (USMS); Immigration and Customs Enforcement (ICE) of the Department of Homeland Security; U.S. Customs and Border Protection (CBP) of the Department of Homeland Security; Department of Defense (DoD) National Guard; and state and local law enforcement. Figure 1 depicts the NGIC staffing and organization structure.

[20] The rotating NGIC Deputy Director position is currently filled by an FBI senior investigator whose time is spent at GangTECC, supporting GangTECC, and handling a GangTECC caseload. There has not been an NDIC representative to NGIC since January 2009, or a Law Enforcement Fellow since June 2008.

Figure 1: NGIC Organization



Source: NGIC.

Each intelligence analyst who works at NGIC is assigned specific gangs to research and analyze, with a total of 20 different gangs assigned among the 20 intelligence analysts. The duties performed by NGIC analysts and other personnel vary. NGIC employees may assist in investigations, respond to requests for information and assistance from the Center's customers, generate intelligence work products, perform outreach to the law enforcement community, deconflict investigations, serve as liaisons with other agencies,

work on special projects, work with the Law Enforcement Online (LEO) system, and perform administrative duties.[21]

The intelligence work products NGIC analysts produce include intelligence assessments, intelligence bulletins, regional and national threat assessments, information papers, link charts showing connections among individuals and organizations, timelines of activities, and related analytical products for operational support and intelligence purposes. The analysts also make presentations at state gang investigator training conferences and provide training to federal law enforcement agencies. In addition, NGIC responds to requests for information from federal, state, and local law enforcement officials on various gang topics.

GangTECC

On February 15, 2006, the Attorney General announced plans to create a new national anti-gang task force as part of his initiative to combat gangs and gang violence. On June 26, 2006, GangTECC began operations and combined the Department's operational law enforcement components and the Department of Homeland Security's ICE component to identify, prioritize, and target violent street gangs whose activities posed a significant multi-jurisdictional threat. According to its Concept of Operations (see Appendix IV), GangTECC is to coordinate overlapping investigations, ensure that tactical and strategic intelligence is shared between law enforcement agencies, and serve as a central coordinating and deconfliction center for law enforcement investigations of gangs.[22]

GangTECC personnel are contributed by participating Department components and are subject to approval by the Criminal Division's Assistant Attorney General. Unlike NGIC, GangTECC is not authorized a separate budget. Instead, costs are borne by the contributing agencies. As of April 2009, 17 GangTECC staff members worked at the Center full time.[23] In

[21] LEO is a secure website hosted by the FBI that makes information available to the federal, state, and local law enforcement entities that subscribe to it.

[22] GangTECC performs operational deconfliction, which involves determining whether cases are connected to one another, in order to avoid duplication.

[23] Our use of the term GangTECC "members" refers to the representatives from the participating agencies who are assigned to and working full time at the NGIC/GangTECC facility.

addition, three staff members were assigned to GangTECC on a detailed basis.[24]

In a July 2006 memorandum (see Appendix V), the Deputy Attorney General identified the following four goals for GangTECC:[25]

> Assist the initiation of gang-related investigations and enhance existing investigations and prosecutions.
>
> Aid in coordination, deconfliction, and effectiveness of gang-related initiatives, investigations and prosecutions.
>
> Develop an enhanced understanding of the national gang problem and propose strategies and targets to neutralize the most violent, and significant threats.
>
> Coordinate with and support the National Gang Intelligence Center.

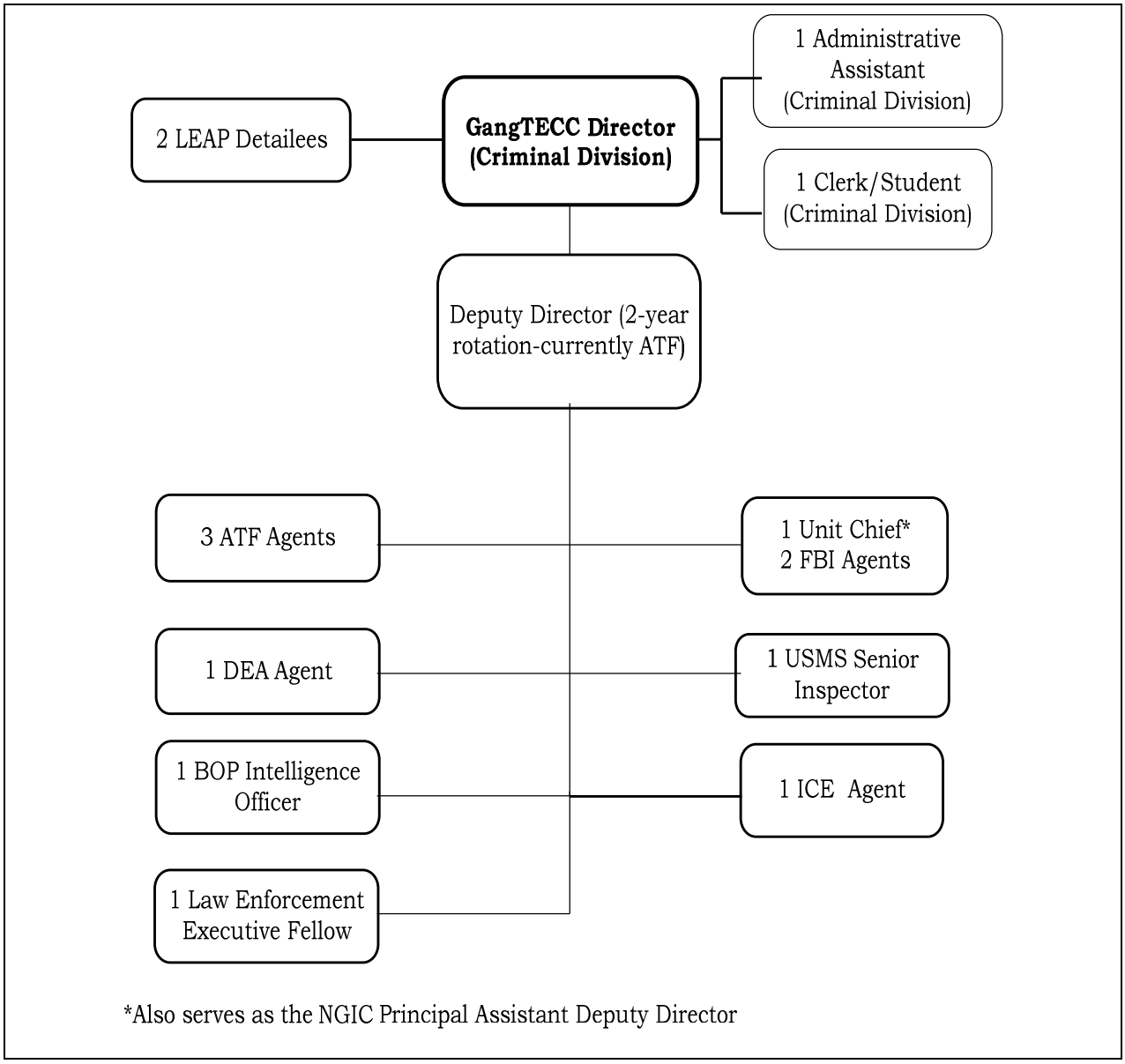
GangTECC Organization

The Criminal Division oversees GangTECC operations, and the Director's position is filled by a senior attorney from that Division. The Deputy Director position is a 2-year rotating position, to be filled by a participating component. The current Deputy Director is from ATF. Agencies that contribute staff and support to GangTECC include the Criminal Division, ATF, FBI, BOP, DEA, USMS, and ICE. Figure 2 shows GangTECC's organization.

[24] Two of the three detailees are individuals from the Department's Leadership Excellence and Achievement Program (LEAP), a part-time program that provides a series of developmental experiences for DOJ employees. The third detailee is a law enforcement Executive Fellow from a local police department.

[25] Paul J. McNulty, Deputy Attorney General, Memorandum for the Establishment of the National Gang Targeting, Enforcement & Coordination Center (GangTECC), and Governing Board of GangTECC and the National Gang Intelligence Center, July 25, 2006.

Figure 2: GangTECC Organization



Source: GangTECC.

GangTECC members identify potential targets for gang cases, deconflict gang investigations, link investigations with common targets, and provide cross-agency information to agents conducting gang investigations in the field. Unlike NGIC analysts, GangTECC investigators typically do not produce written products, as their work primarily focuses on coordinating gang-related investigations. However, the BOP representative at GangTECC is a gang intelligence officer who provides regular intelligence reports to support ongoing and potential gang investigations.

Access to Databases

Although the Centers are co-located, they do not share a database. NGIC and GangTECC members have network access only to the databases and systems of their home agencies. In addition, all NGIC analysts can also access the FBI's databases and systems. However, neither NGIC nor GangTECC members have independent access to the other member agencies' databases and systems. For example, an FBI member of NGIC who needs information found only in an ATF database or system must go to an ATF member at NGIC to obtain that information. The same is true at GangTECC. NGIC has established partnerships with other federal, state, and local law enforcement agencies that have gang-related information and, in some cases, has made arrangements to access those agencies' information.

GangTECC and NGIC Governing Board

The July 2006 memorandum from the Deputy Attorney General established a Governing Board to oversee the activities of the NGIC and GangTECC.[26] The Deputy Attorney General determined that the Governing Board would be chaired by the Directors of both GangTECC and NGIC and would meet, at a minimum, on a quarterly basis. According to GangTECC's Director, the Board has held quarterly meetings. Furthermore, until the April 9, 2009 meeting, no minutes were recorded for previous Governing Board meetings.

The Board is comprised primarily of high-level agency representatives from Department components that contribute personnel and support to NGIC and GangTECC. Other members include representatives from the Executive Office for United States Attorneys (EOUSA), the Department's Chief Information Officer, the Subcommittee on Violent and Organized Crime of the Attorney General's Advisory Committee, the Attorney General's Anti-Gang Coordination Committee (AGCC), NDIC, and the Regional Information Sharing Systems (RISS).[27]

The Governing Board approves policies and procedures for NGIC and GangTECC to ensure that they are consistent with the anti-gang policies

[26] On July 28, 2005, the Deputy Attorney General established a Governing Board only for NGIC. The Deputy Attorney General's July 2006 memorandum, which established GangTECC, expanded the Governing Board to oversee both NGIC and GangTECC because of the need for coordination between the entities.

[27] RISS is a national network comprised of six multistate centers operating on a regional basis. Its mission is to support law enforcement efforts nationwide to combat illegal drug trafficking, identity theft, human trafficking, violent crime, terrorist activity, and to promote officer safety.

established by the Attorney General, the Deputy Attorney General, and the AGCC. In the spring of 2007, the Governing Board approved the Concepts of Operations outlining NGIC's and GangTECC's goals and objectives.

Gang Unit

In September 2006, several months after GangTECC's creation, the Attorney General created the Gang Unit in the Criminal Division to develop strategies for prosecuting the most significant national and transnational gangs in the country. The Criminal Division's Gang Unit, originally called the Gang Squad, is a group of experienced federal prosecutors who are responsible for assisting local United States Attorneys' Offices (USAO) in prosecuting gang cases of national importance and coordinating with USAOs on legal issues and multidistrict gang cases. The Gang Unit is also responsible for providing legal expertise on federal domestic violent crime offenses and federal firearms and explosives violations. According to the Criminal Division's FY 2009 budget documents, Gang Unit prosecutors are to "work hand-in-hand" with GangTECC and NGIC in a "collective effort to target and dismantle the most serious gang related threats nationwide."[28]

[28] While the Gang Unit's work relates to our review of NGIC and GangTECC, we did not review whether the Gang Unit's activities are meeting its stated mission.

RESULTS OF THE REVIEW

NGIC AND GANGTECC ARE NOT FULLY MEETING THE ROLES FOR WHICH THEY WERE CREATED

Three years after the creation of NGIC, it still has not developed a gang information database as directed by law. Further, due to its limited outreach efforts and the perception that the NGIC is FBI-centric, NGIC had received only 213 requests for assistance from law enforcement agencies in 3 years, an average of only 6 requests per month. Moreover, some agencies that routinely encounter gang issues in their work were not frequent customers of NGIC.

Regarding GangTECC, we found that the lack of an independent budget has hindered it from implementing an effective program for coordinating gang investigations and prosecutions, or an effective outreach program. In addition, GangTECC did not implement a process to deconflict investigations until January 2009, 3 years after it was created. The manual deconfliction process it then implemented proved unworkable and was discontinued within several months. Also, GangTECC lacks sufficient attorneys to provide guidance on gang investigations. After updating its list of priority gang targets, GangTECC still has not disseminated the information widely.

NGIC has not developed a gang information database as directed by Congress.

In funding NGIC, Congress directed that NGIC was to, among other things, serve as an "information management mechanism for gang intelligence on a national and international scope."[29] To accomplish this, NGIC developed plans to create and maintain a library of gang identification information accessible through the FBI's LEO, an information sharing network. It also developed plans to establish "electronic bridges" to federal, state, and local information technology systems to connect disparate federal and state

[29] Conference Report, *Making Appropriations for Foreign Operations, Export Financing, and Related Programs for the Fiscal Year Ending September 30, 2005, and For Other Purposes*, November 19, 2004, H. Rept. 108-792.

databases containing gang information or intelligence.[30] As detailed below, because of technological and operational problems, the information management system and electronic bridges have not progressed beyond the development phase.

Past Action to Obtain a Gang Information System

On September 11, 2007, NGIC contracted with a technology provider to design, deliver, and deploy a database of information on gangs (gang library), software applications for searching and retrieving information in the library, and computer servers. However, a year later, NGIC determined that the contractor was unable to meet the contract's requirements for the library and other software applications. In addition, the contractor included software features that NGIC did not need or request. The contractor attempted to correct issues that NGIC identified in the software applications and the management of the project. For example, the contractor replaced a program manager in an effort to improve supervision of the project in order to meet its milestone dates. On October 1, 2008, the contract was not renewed, although some applications that were developed by the contractor may be able to be modified and used by a new contractor, such as the partially developed gang library. According to the FBI's Information Technology (IT) personnel working on this contract, approximately $2.7 million was paid out on this contract before the decision was made not to renew it.

Recent NGIC Action to Obtain a Gang Information System

On April 8, 2009, NGIC solicited input from IT companies for NGIC's intent to "design, develop, and implement an integrated NGIC Information System." The functional requirements specified by NGIC for its proposed information system are identical to those specified by Congress when NGIC was created: an "information management mechanism for gang intelligence on a national and international scope." NGIC officials said this solicitation is not intended to award a contract to actually build a gang information database. Rather, it is to determine whether IT companies thought there were technical limitations in satisfying the functional requirements of an NGIC information management system and answering any questions the companies might have about the project.[31]

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[30] NGIC informed us it does not intend to create a national gang intelligence database. Instead, NGIC is developing an information system that will include its gang library and the electronic bridges to access various gang databases maintained by the states or other federal entities. For the purpose of this report, OIG is referring to NGIC's information system when we discuss the implementation of a gang information management database.

[31] Subsequently, a Request for Bids was offered to any contractor wanting to bid on the project and a contract was awarded on September 1, 2009.

Difficulties in creating electronic bridges to other gang databases

In addition to overcoming the technical obstacles to creating an information management system, establishing electronic bridges from NGIC's information management system to state or federal databases is complicated by differing configurations, systems, and security requirements.[32] These issues must be overcome if the NGIC is to develop a cost-effective gang information system accessible to stakeholders at the federal, state, and local law enforcement levels. However, more than four years after the Department's Office of the Chief Information Officer provided a report to the Deputy Attorney General, NGIC has still not addressed an important issue the report raised regarding electronic bridging:

> [An] integrated system for anti-gang information need not be a single monolithic data warehouse . . . existing systems should be connected together and enabled to interoperate.

Unless NGIC obtains a technical solution for bridging between federal and state databases, NGIC's ability to use existing gang information will be limited.

The FBI has stated that a major problem contributing to the technical solution is that there is no standard nationwide definition of what constitutes a "gang" or "gang member," making uniform entry into a database problematic. This issue also was recognized in the Office of the Chief Information Officer report to the Deputy Attorney General, which stated that:[33]

> In addition, the NGIC should help drive community-based development of policy standards, from the definition of categories of gangs to criteria for assertion of gang membership.

The lack of clarity in defining gangs and what constitutes gang membership has resulted in states creating their own gang definitions and disparate databases using various state standards of gang membership. For example, Colorado's standards for updating its database with a confirmed "gang member" requires satisfying one of several factors that range from admitting to gang membership, to committing a gang-motivated crime to exhibiting gang membership (clothing, tattoos, mannerisms, etc.). On the other

[32] Report to the Deputy Attorney General, *Feasibility Assessment of an Integrated Anti-Gang Network for the Department of Justice*, Office of the Chief Information Officer, July 15, 2005, 11-15.

[33] Report to the Deputy Attorney General, *Feasibility Assessment of an Integrated Anti-Gang Network for the Department of Justice*, Office of the Chief Information Officer, July 15, 2005, 11-15.

hand, Texas allows any state law enforcement agency to create its own gang database and include information on individuals who meet two of five criteria. The criteria are: (1) self-admission of criminal street gang membership; (2) identification as a criminal street gang member by a reliable informant or other individual; (3) corroborated identification as a criminal street gang member by an informant or other individual of unknown reliability; (4) evidence that the individual frequents a documented area of a criminal street gang, associates with known criminal street gang members, and uses criminal street gang dress, hand signals, tattoos, or symbols; or (5) evidence that the individual has been arrested or taken into custody with known criminal street gang members for an offense or conduct consistent with criminal street gang activity.

We believe that before NGIC creates a gang information system, it must resolve the issue of defining the term "gang" and establish standards for what constitutes gang membership. Without resolving these issues, NGIC runs the risk of establishing electronic bridges to databases with questionable gang information or generating incorrect gang intelligence based on information from these databases.

In summary, NGIC has yet to fulfill the requirement to create a comprehensive national gang information database to support the Department's anti-gang initiatives. Moreover, although several states have established databases containing gang intelligence information, the development of the NGIC system has not progressed sufficiently for us to evaluate whether it can resolve technological obstacles and build on these existing databases.

Recommendations

We recommend that:

1. NGIC establish a working group composed of representatives from its member agencies and state and local law enforcement to identify methods for sharing gang-related intelligence across the law enforcement community. This working group should address, among other issues: (a) a definition of "gang" and criteria for identifying gang membership; and (b) data standards for entering gang information into databases

2. NGIC create an implementation plan that identifies functional requirements with milestone dates to procure a gang information management system.

NGIC is not effectively sharing gang intelligence and information.

For the NGIC to effectively share gang intelligence and information, it must both know the needs of the law enforcement personnel who are its customers and ensure they are aware of the Center's capability to support their gang-related investigations and prosecutions. When it receives a query from a customer by e-mail, telephone, or in person, NGIC creates a Request for Information. We examined NGIC's Request for Information workload to identify patterns or trends in the customers who are submitting requests and the types of assistance that they request. In our review, we found that the NGIC received few requests for assistance, averaging less than six a month. We also found that some agencies that routinely encounter gang issues in their work – such as ATF – rarely used NGIC for gang-related intelligence products and services.

In addition, we found that NGIC did not have an adequate process in place to monitor customer satisfaction with its intelligence products and other types of assistance. Finally, we found that GangTECC customers who used NGIC's intelligence products considered them to have limited usefulness.

NGIC has few regular users outside of the FBI, GangTECC, and itself.

From January 1, 2006, to February 19, 2009, NGIC received requests for assistance from 18 customer groups for 16 types of information. We analyzed the customers and the information requests to identify trends. Because GangTECC was intended to be one of the major users of NGIC's services, we also analyzed GangTECC's requests. The results of our analysis follow.

Majority of NGIC customers consisted of three groups and some customer groups are underrepresented or not represented at all.

We analyzed the 18 customer groups that requested information from NGIC (see Table 3). We found that the majority of NGIC's work – 64 percent – came from just three organizations: the FBI, GangTECC, and NGIC itself. We also noted that GangTECC had submitted the second largest number of requests for information to NGIC, but only recently began requesting information on a regular basis from NGIC in FY 2008.[34] (We further discuss the interactions between NGIC and GangTECC later in the report.)

The remaining 36 percent of requests for information from NGIC were distributed among 15 other customer groups. The largest of these customer groups is the state, local, and tribal law enforcement.

[34] According to GangTECC members, they submitted requests to NGIC prior to this time, but the requests were not tracked GangTECC or NGIC.

According to NGIC management reports, NGIC personnel attempted to advertise NGIC's presence and establish points of contact among state and local law enforcement by attending over 30 conferences, including 14 that were specifically for state and local gang investigators. NGIC also serves as an advisor to the National Alliance of Gang Investigators Association Governing Board, which has allowed the Center to develop lines of communication to approximately 20,000 state and local gang investigators. However, despite NGIC's outreach efforts, this customer group made an average of only 3 requests per year, submitting only 13 of the 213 (6 percent) total requests for information received by NGIC from its inception in 2006 to February 2009. Moreover, NGIC has received no requests for gang-related information from tribal law enforcement officials, a group specifically identified by NGIC in its operational plan as one with which it would share gang intelligence.

NGIC management stated that there were two reasons for the small number of requests received by the Center. The first reason was due to the law enforcement community's lack of familiarity with NGIC, despite its attempts to advertise its presence. The second proffered reason was that some NGIC personnel may not have been recording all of the requests that they received. The NGIC Director stated that NGIC personnel receive many phone calls from state and local law enforcement contacts, but what they do in response to these phone calls may not be captured as a response to a request for information. While we could not verify the quantity of work not properly recorded, none of the NGIC analysts mentioned to us that this type of telephone inquiry was a significant part of their workload.

We also noted that the customers from whom NGIC has received few requests for gang information include several components of the Department that routinely address gang-related matters in their operations. For example, the USMS has submitted just five requests and ATF only one. Similarly, the High Intensity Drug Trafficking Areas (HIDTA), the National Drug Intelligence Center (NDIC), and the Office of National Drug Control Policy (ONDCP) have submitted one request each.[35] The reasons for this low usage rate are discussed below.

[35] The HIDTA program enhances and coordinates the drug control efforts of participating local, state, and federal law enforcement agencies by providing resources to combat drug trafficking in critical regions of the United States. HIDTAs are areas within the United States. that are designated by the ONDCP Director as exhibiting serious drug trafficking problems and harmfully impacting other areas of the country. NDIC is a Department component whose mission is to coordinate, consolidate, and disseminate drug intelligence from all national security and law enforcement agencies. ONDCP is a component of the Executive Office of the President that establishes policies, priorities, and objectives for the Nation's drug control program.

Table 3: NGIC Customer Requests for Information

Customer Group	Fiscal Year[a]					Total
	2006	2007	2008	2009	Unknown Date	
FBI	**14**	**4**	**20**	**26**	**7**	**71**
GangTECC	**0**	**0**	**31**	**16**	**0**	**47**
NGIC	**0**	**0**	**0**	**18**	**0**	**18**
State, Local, and Tribal Law Enforcement	3	0	7	3	0	13
El Paso Intelligence Center (EPIC)	0	1	6	1	0	8
Federal and State Prosecutors	0	0	2	5	0	7
Department of Homeland Security (DHS)	0	0	0	5	0	5
USMS	1	0	4	0	0	5
International Law Enforcement	2	0	0	1	0	3
BOP	0	0	0	1	1	2
ATF	0	1	0	0	0	1
GAO	0	0	0	1	0	1
HIDTA	0	0	0	1	0	1
Media	0	0	0	1	0	1
Military	0	0	1	0	0	1
NDIC	0	0	0	1	0	1
ONDCP	0	0	1	0	0	1
RISS	0	1	0	0	0	1
Unknown[b]	1	4	12	3	6	26
Total	**21**	**11**	**84**	**83**	**14**	**213**

[a] Two of the fiscal years in this table are partial years. FY 2006 covers the period January 1, 2006 to September 30, 2006 and FY 2009 covers the period October 1, 2008 to February 19, 2009.

[b] Records in which the requester name field was blank or there was insufficient information to identify the requester are grouped as "Unknown."

Source: NGIC.

NGIC is not perceived as an independent, multi-agency center.

In discussing why NGIC was not used more frequently by law enforcement agencies, we found that NGIC is perceived by many law enforcement personnel as being FBI-centric in the products it generates and the intelligence analysis that it provides. NGIC and GangTECC personnel also voiced their concerns about NGIC's FBI-centric image.

Of the 14 NGIC analysts we interviewed, 4 referred to the NGIC as "FBI-centric." One of the four analysts said that the "law enforcement community's fear is [NGIC] is still part of the FBI . . . ." In addition, four GangTECC personnel indicated the same perception. One of the four Gang TECC personnel stated that "people [are] reluctant to share information with NGIC because . . . [the] Center is essentially the FBI's own gang intelligence shop." Some concerns expressed by law enforcement officials included that the information sharing is not reciprocal and that intelligence products generated by NGIC reflect only FBI information and not information from other agencies.

Overall, we found that in the 38-month period we examined, NGIC received only about 6 requests for information a month. The rate of information requests increased to about 17 requests a month in the first 5 months of FY 2009. However, that number is still small given the NGIC's staffing of 20 intelligence analysts. Moreover, the preponderance of FBI and internal requests suggests that the NGIC remains primarily focused on FBI investigations and has not become the national resource on gang intelligence for federal, state, and local law enforcement as envisioned. Until state and local law enforcement agencies rely on the NGIC's services, NGIC's ability to assist gang investigations will be limited and the Center's resources will continue to be underutilized.

Information NGIC provides is broad, but sometimes of limited use.

We also examined the requests received by NGIC to identify the types of information requested and any trends in the requests over time. During the time period we examined, almost half of the 213 requests were for gang background information (40), queries for BOP targeting packages (33), or information on specific gang members (29).[36] These requests were mirrored in our interviews with NGIC customers, during which they stated that the types of services that would be helpful to them were gang background information (general and specific groups) and investigative analyses on specific groups and trends observed. Table 4 shows the 16 categories of requests NGIC received.

[36] The requests related to queries for BOP targeting packages are generated by GangTECC and is part of their priority targeting function by identifying inmates and their associates outside the prison system who assist them in committing crimes.

Table 4: Types of Information Requested From NGIC

Request Type	TOTAL	1/1/06-9/30/06	FY 2007	FY 2008	10/1/08 – 2/19/09	Unknown Date
Gang Background Information	**40**	5	3	11	20	1
BOP Targeting Information	**33**	0	0	24	9	0
Specific Individual Information	**29**	0	0	12	17	0
Case Support	**18**	3	3	0	11	1
Training/Presentation	**16**	1	0	4	10	1
Consolidated Priority Organization Target Validation	**14**	8	1	0	0	5
Product Reviews	**10**	0	1	5	4	0
EPIC Request	**7**	0	0	6	1	0
FBI Management Taskings	**7**	1	0	4	2	0
Miscellaneous	**4**	0	1	1	1	1
Briefings	**3**	0	0	0	3	0
Deconfliction	**3**	0	0	0	3	0
Graffiti Identification	**3**	0	0	1	2	0
Threat Assessment	**3**	0	1	1	0	1
Tattoo Identification	**2**	1	0	1	0	0
Gang-related Travel	**2**	0	0	0	0	2
Blank/ Unknown	**19**	2	1	14	0	2
Total	**213**	**21**	**11**	**84**	**83**	**14**

Note: EPIC requests are requests that are initially received by EPIC and subsequently forwarded to NGIC for further processing. FBI management taskings include providing briefing points or gang summaries to senior FBI managers.

Source: NGIC.

We also examined the types of information requested to identify trends in the services provided by NGIC and possibly help NGIC determine which services it should concentrate on or discontinue. We found instances in which NGIC no longer received or had only recently began to receive certain types of requests. For example, we noted that during its first two years of operation, NGIC received requests for Consolidated Priority Organization Target validations, a program which compiles a list of major international drug trafficking and money laundering organizations for the Department to target. During the first year (2006), this category accounted for 38 percent (8 of 21) of the requests for information received by NGIC. When asked about these requests, NGIC management stated that all of these requests are generated by FBI agents and are forwarded to NGIC which, in turn, forwards the requests to the Special Operations Division for processing because NGIC is not a drug

enforcement entity.[37] An NGIC analyst was designated as a contact person for Consolidated Priority Organization Target validations and was responsible for assisting the requestor with processing the request. However, NGIC analysts did not perform any analyses on these requests, and NGIC has not received any validation requests since 2007.

We also determined that during the 3 years we examined, over half of the information categories included less than 10 requests. However, we found no evidence that NGIC analyzed the requests it received and the amount of time required to process each request, evaluated shifting trends in information being requested, identified request types that merit the most attention, or realigned their resources to address the most important categories. We believe NGIC should examine the types of services that have been requested and the resources expended on each type to identify those most appropriate for the use of its limited resources.

Interaction between GangTECC and NGIC remains limited.

Although GangTECC's operational guidance states that it is intended to be a major user of NGIC's gang intelligence services, it only recently began to request information on a regular basis from NGIC in early 2008 and its use of NGIC information remains limited. Beginning on February 28, 2008, and through the remaining 8 months of FY 2008, GangTECC submitted 31 requests for information – the most for any customer in that fiscal year overall.[38] Of all the Requests for Information received by NGIC from January 1, 2006 to February 19, 2009, GangTECC accounts for 22 percent (47 of 213).

Although the number of requests submitted by GangTECC to NGIC has increased, most of GangTECC's requests (33 of 47, or 70 percent) were queries for information for inclusion in the "BOP targeting packages" it prepares which contain information on individuals outside of the BOP facility who communicate with federal inmates and may be involved in suspicious

[37] FBI stated that prior to the creation of NGIC, the FBI's Gang Unit processed Consolidated Priority Organization Target validations. Upon creation of the NGIC, FBI entities continued to forward these validations to NGIC even though NGIC was not a drug enforcement entity. Ultimately, these requests were stopped. FBI added that it was not known at the beginning, the number of requests that would be made, nor the requests that would become obsolete as missions and objectives changed.

[38] Both GangTECC and NGIC personnel stated that requests were submitted prior to this date but that neither Center tracked these requests. Using other information provided by NGIC, the OIG was able to identify another nine instances in which there were joint efforts by NGIC and GangTECC for the time period covering July 11, 2006 to July 15, 2008. These instances were identified as talking points, briefings, tactical analysis, and travel for meetings.

activity.[39] This type of request is handled between two NGIC and GangTECC staff members. The remaining 14 requests (30 percent) were spread among 6 categories of information (Table 5).

Table 5: Types of Information GangTECC Requested From NGIC

Type of Request	FY 2008	10/1/08 – 2/19/09	Total
BOP Targeting Packages	24	9	33
Specific Individual Information	4	1	5
Gang Background Information	1	0	1
Training Presentation	1	0	1
Case Support	0	2	2
Deconfliction	0	3	3
Graffiti Identification	0	1	1
Blank/Unknown	1	0	1
Total	**31**	**16**	**47**

Source: NGIC.

We spoke with GangTECC personnel about the kinds of assistance for which they look to NGIC. Six of 12 GangTECC employees stated that GangTECC needs intelligence case support from NGIC, but they also told us that they believed NGIC is more oriented to providing intelligence products that are not tailored to a particular case. For example, case support could require an analyst to review information gathered during the course of an investigation and then conduct analyses to show how multiple gang cases fit together. The GangTECC personnel we interviewed said they often do not find NGIC products useful for this purpose. As Table 5 illustrates, GangTECC requests for case support do not constitute a significant portion of GangTECC's requests to NGIC.

In the instances where GangTECC received case support from NGIC analysts, they said the results were favorable. The GangTECC Director stated that an NGIC analyst did "a phenomenal job" working with intelligence analysts from five or six other federal law enforcement agencies to obtain information on a case and then briefed the GangTECC agent about it. Some NGIC personnel also agreed that there was a benefit to NGIC analysts providing case support to

[39] The BOP representative to GangTECC requests information about those individuals from the NGIC analyst who is designated as the contact point for processing this type of request. The NGIC analyst queries databases and provides information found on the individuals to the GangTECC BOP representative. The GangTECC BOP representative adds information obtained from NGIC to the targeting package and is given to a GangTECC member to review. Some targeting packages may be referred to other agencies for further investigation.

GangTECC. For example, one analyst told the OIG that, as a result of what she learned from the analyses that she performed on several investigations, she plans to write an intelligence bulletin.

The Directors of GangTECC and NGIC also told us that they had regularly exchanged information since the inception of the Centers. However, our discussions with the staffs of both Centers did not elicit information indicating there was a significant direct exchange of information between the analysts and investigators during the first years of the Centers' operations. Our analysis of FY 2009 workload, and our follow up interviews with analysts and investigators, found that interactions had improved in FY 2009, although the interactions remain limited and ad hoc in nature.

Although GangTECC's use of NGIC has increased, the underrepresentation or absence of key law enforcement customers, and the overall small number of requests received, calls into question NGIC's effectiveness to share relevant gang-related information and provide useful support to law enforcement personnel who are conducting gang investigations and prosecutions.

NGIC's monitoring of customer satisfaction with its intelligence products is deficient.

We reviewed customer satisfaction surveys distributed by the FBI to identify whether the above concerns were reflected in customers' opinions about the services provided by NGIC. The OIG found that NGIC had no process for monitoring the survey responses to determine whether its intelligence products are meeting customer's needs. In addition, we found that the surveys NGIC administered only cover the intelligence products generated by NGIC and not the other services that it provides.

The FBI survey asks NGIC customers who have either requested an intelligence product or received an intelligence product generated by NGIC analysts to rate the product for quality. They rate such factors as whether the product was timely, relevant, clear, and reliable – on a scale of 1 (strongly disagree) to 5 (strongly agree). Customers also are asked to rate the value of the product, including whether the product (1) helped close an intelligence gap, (2) changed an investigative priority, (3) resulted in a more informed decision on an investigation, or (4) identified new information on a pending investigation.

NGIC did not use customer responses to assess its own performance.

Our analysis of 511 customer satisfaction surveys returned to NGIC found that customers expressed overall satisfaction with NGIC intelligence

products.[40] For the factors of quality and value, NGIC averaged a score of 3.5 out of 5 for the 511 surveys. However, we noted that 333 (65 percent) of the responses came from recipients in NGIC's parent agency, the FBI, while non-FBI customers accounted for only 41 or 8 percent of the customer surveys returned. The surveys did not identify the originating entity in 137 instances (27 percent).

We also found that NGIC does little with comments made on the customer satisfaction surveys. Specifically, the Deputy Director told us that NGIC has "followed up on several forms on occasion" but has not attempted to analyze the information customers have included in comments on the survey forms. For example, one survey on the topic of gang involvement in mortgage fraud schemes stated that the "intelligence assessment was very basic and lacked specific information for identifying mortgage/real estate transactions that may be gang related." We believe that NGIC could have issued a supplemental product to address the concerns of this FBI customer, but it did not. An NGIC official said they do not have adequate resources to analyze customer comments.

NGIC intelligence products have limited usefulness to GangTECC personnel.

Because GangTECC was intended to be a major user of NGIC's services, we asked GangTECC personnel which NGIC intelligence products they had used during the course of their work. Products provided by NGIC addressed a variety of issues such as prison gangs, identifying new gang tattoos, the methods gangs use to incorporate religion as part of the gang identity, conflicts between rival gangs, mortgage fraud schemes that a particular gang was involved in, and gang involvement in the sexual exploitation of women and children. Four GangTECC investigators stated that they were not familiar with any of NGIC's intelligence products. Of the remaining six investigators, two were aware of NGIC's products, but described them as too theoretical, broad, and historical to provide operational information. Only four investigators reported using NGIC's products to obtain background information about a particular gang.

One NGIC analyst told the OIG that NGIC intelligence analysts were "writing history" rather than producing leads that can be acted on. He said the analysts were telling the readers about previous cases rather than analyzing

[40] Surveys are included as part of each product and each person who obtains a copy of an NGIC intelligence product may submit a survey response. Therefore, there are more survey responses on file than there have been products issued. Further, because LEO did not provide us with information on the number of intelligence products downloaded, we do not know how many customers received them.

transactions that are occurring and recommending action, such as establishing a wiretap.

Some GangTECC personnel stated that NGIC intelligence products were written only by the FBI representatives at NGIC and that the products therefore would only reflect the FBI's data. A GangTECC member gave an example that if he asked NGIC for information about cases opened on the MS-13 gang, his experience was that NGIC might provide only those cases the FBI worked on. An FBI GangTECC member commented that since most of the NGIC products he receives come from the FBI analyst at NGIC, he is not sure if information from other agencies is included.

In addition to the usefulness of NGIC's intelligence products, some NGIC personnel we interviewed were also concerned about the time it took NGIC to disseminate its intelligence products. One of the NGIC members told us that "it is impossible for the FBI analysts to get a product out that's timely because there are so many review levels." He provided an example where it had taken NGIC 3 months to issue an assessment of a prison escape that involved gang members. An NGIC analyst from the FBI stated that while the NGIC analysts had been told intelligence products are important, their reports may sit on a reviewer's desk for weeks. She cited an example in which a product was held up because the "title didn't work." The analyst said that as a result, the report sat on a reviewer's desk for 6 weeks when the matter "could have been resolved in 10 minutes."

The FBI stated that, as mandated by the FBI's Directorate of Intelligence, NGIC managers must allow time for their analytical products to be reviewed and edited by entities within the Directorate of Intelligence, which can delay dissemination. However, we noted that this review process does not apply to the analytical products generated by personnel of other member agencies.

The absence of an effective process to assess customer satisfaction with NGIC products and services, to assess the usefulness of other services NGIC provides, or to assess other unmet customer needs reduces NGIC's ability to share relevant gang-related information and provide useful support to law enforcement personnel who are conducting gang investigations and prosecutions.

Recommendations

We recommend that:

3. NGIC analyze the responses to past customer surveys on intelligence products to identify improvements that would make its intelligence products more useful to customers.

4. NGIC expand its customer satisfaction surveys to include recipients of all of its products and services.

5. NGIC analyze the types of information being requested and the time spent responding to each request type to better allocate its resources.

6. NGIC track all requests for information that it receives.

GangTECC has insufficient resources to carry out its mission of coordinating gang investigations and prosecutions.

When it was established, GangTECC was provided with only eight members, no operating budget, and a broad, multi-purpose mission.[41] Because GangTECC does not have an operating budget, participating components are required to assign staff to GangTECC and pay their salaries out of their own budgets. The lack of an operating budget also has prevented GangTECC managers from taking actions essential to implementing the Center. For example, GangTECC cannot fund travel to case coordination meetings for its member nor representatives from state and law enforcement agencies working on the case. Also, GangTECC has been unable to implement electronic communication and tracking capabilities or fund its Executive Fellow program which provides opportunities for state and local law enforcement officers to enhance their skills by working with federal law enforcement agencies for a 6-month period.[42] Communicating with state and local agencies is vital to GangTECC's ability to coordinate cases, collect gang intelligence, and identify priority targets. Moreover, GangTECC's outreach and training efforts have been hindered due to a lack of funding. Officials in the Criminal Division and the Office of the Deputy Attorney General agreed that lack of an operating budget is GangTECC's biggest problem. The impact that the lack of funds has on GangTECC's ability to execute its broad mission is detailed below.

<u>GangTECC's case coordination efforts are limited by the lack of an operating budget</u>.

Organizing and participating in case coordination meetings is central to GangTECC's mission. Members of GangTECC identify opportunities to link local agency gang investigations by reviewing open cases to compare targets

[41] The Deputy Attorney General's July 26, 2006, memorandum specified that at least seven experienced agents from the Department's components be assigned to GangTECC. The eighth member was to be from ICE.

[42] In June 2009, ATF assigned one of its grant-funded Executive Fellows to work at GangTECC.

and to determine whether other components have initiated or begun building cases on the same targets. After linking related investigations, the Center attempts to organize case coordination meetings to bring together federal, state, and local investigators, analysts, and prosecutors to share information. If successful, the coordinated cases bring charges against large, geographically dispersed gang-related criminal enterprises.

For example, GangTECC identified that violent national street gang investigations being conducted by federal and local agencies from the east and west coasts were connected. GangTECC arranged for ATF to fund travel expenses for a federal agent and local law enforcement officers from the east coast to meet with the federal and local prosecutors, federal agents, and local officers on the west coast. As a result, the agents located the primary gang member who was directing the migration of the west coast gang to the east coast. According to an investigator involved in this case, GangTECC served an integral role in coordinating the exchange of information between investigators on both coasts in an investigation that subsequently resulted in almost 30 conspiracy indictments under the *Racketeer Influenced and Corrupt Organizations Act* (RICO).

During its 3-year existence, GangTECC has coordinated 12 cases involving multiple law enforcement agencies and jurisdictions. In addition, according to GangTECC's Director, GangTECC also has facilitated cooperation in over 100 cases where investigators or agencies would not initially share information on common targets with one another. Law enforcement personnel we interviewed who had used GangTECC's services reported high levels of satisfaction and told us that case coordination was the most helpful service that the Center could provide to the field. Ten of the customers we interviewed stated that they used the information provided by GangTECC to coordinate with other agencies. As a result, they identified instances in which the same individual was the subject of investigations in multiple jurisdictions.

Many customers commented that they did not previously know of the connections identified by GangTECC and would not have discovered them without GangTECC's assistance. As gang investigations expand into larger, cross-agency investigations and prosecutions, GangTECC's USMS representative told us that gang investigators in the field have received critical information about gang members who are wanted suspects, resulting in the apprehension of fugitive gang members.

However, GangTECC's efforts have been hindered by resource limitations. The GangTECC Director told us there have been at least five occasions when the Center has been unable to host, or even attend, case coordination meetings out of state because it was unable to fund travel costs. For example, GangTECC could not host case coordination meetings for two

cases involving a national gang. In other instances, GangTECC could not send representatives from all the components involved in a case against another national gang to a coordination meeting, nor could they send representatives from the state and local law enforcement agencies that were involved in the case. We were informed that videoconferencing or conference calls would not suffice for these meetings because the participants need case files available for review in order to share and exchange information about their investigations. Although some of the GangTECC representatives are allocated small budgets from their home components for gang-related cases, they are typically only permitted to use the funds for their home components' cases.

Almost all of the 12 GangTECC members we interviewed, as well as the GangTECC Director and Criminal Division officials, stressed that lack of an operating budget is the biggest hindrance for the Center, particularly when it prevents the Center's personnel from fully participating in case coordination meetings. The Criminal Division's FY 2009 congressional budget request recognized this problem, stating:

> Travel to various locations for investigative case coordination meetings, conferences and operational planning is a basic and essential need for the success of GangTECC. Currently, this travel is unfunded and being paid by each of the participating components when and if they can afford it.

As a result of the budgetary limitations on GangTECC's ability to execute its mission, opportunities to better coordinate the Department's efforts to combat gang crime have been missed.

Lack of technology hampers GangTECC's communications.

Although GangTECC members told us that cross-agency information sharing is relatively easy to accomplish given their proximity to each other, GangTECC members cannot e-mail documents to each other, use a uniform e-mail system to exchange information across components, or collectively store and track information on a shared drive. GangTECC members also cannot send Center-wide e-mails and electronic information to its customers because there is no common e-mail system. Instead, GangTECC members must use servers from their respective agencies to communicate electronically within GangTECC as well as to its customers.

The lack of a dedicated server inhibits GangTECC's ability to collectively store and track information. Rather, GangTECC members have been manually tracking the assistance they provide in hard copy logbooks. The GangTECC Director told us that having a common computer system or developing a method for existing system to communicate would greatly assist the Center in

its intelligence sharing and case coordination duties. In addition, almost every regional and national gang has a large presence on the Internet through social networking and private websites and GangTECC lacks funding for equipment to exploit this potential source of information on gangs.

GangTECC is unable to engage in needed outreach efforts.

We found that even though GangTECC has made some efforts, its services are not adequately advertised. GangTECC's operational plans state that its outreach efforts "will utilize various methods to inform federal, state, and local law enforcement and prosecutors of the resources available to them through GangTECC." The plans further specify that outreach "includes sponsoring domestic and international training, providing materials at national and regional conferences, and posting information on law enforcement websites and publications." In accordance with its operating plan, GangTECC has conducted several training sessions or presentations since its inception at a variety of venues, including the California Gang Investigators Association, the National District Attorneys Association, Project Safe Neighborhood conferences, the National Sheriffs' Association, the Virginia Department of Corrections, and the Los Angeles Sheriff's Department.

Nonetheless, field components generally remain unaware of GangTECC's services. Only 30 percent (7) of the GangTECC customers we interviewed told us that other agents or officers in their organization were aware of the Center. Four others said they believed that only those who worked gang investigations knew about GangTECC. At least two of the customers who received assistance from GangTECC (after the Center contacted their offices) still did not know what other types of services were provided by GangTECC. Another customer said "GangTECC is a good concept, but they need better communication with the field and better advertising as to what they can offer the field."

We found that GangTECC members are aware that the Center is not well known. Most GangTECC members we interviewed (8 of 12) also told us that only some in the law enforcement community were aware of the Center. Half of them (4 of 8) stated that those in the law enforcement community that were aware of GangTECC probably did not know what assistance GangTECC could provide. In fact, four believed the law enforcement community was not aware of GangTECC at all and that GangTECC needed to "advertise" more.

Forty percent of the GangTECC customers we interviewed stated that sending information via e-mail and making presentations at conferences and meetings is the best way for GangTECC to advertise its services. However, GangTECC's ability to sponsor training and produce conference materials to conduct outreach is hindered by the lack of an operating budget. Although GangTECC members have made presentations at approximately 60 meetings

and conferences, the Center has been unable to sponsor any "domestic and international training," as mandated by its Concept of Operation. Nor does GangTECC have money to produce materials for distribution at national and regional conferences.[43]

In late 2007, the Criminal Division agreed to make $25,000 available to GangTECC for outreach efforts in response to the Director's request for funds to cover training materials and related expenses for advertising at gang conferences. However, this small one-time disbursement is not sufficient to support GangTECC's long-term need to develop its training and outreach efforts.

In summary, the lack of an operating budget has hindered GangTECC's ability to function as the Department's anti-gang central coordination center. It has limited the Center's participation in case coordination meetings and prevented it from directly supporting field operational costs. Internally, the lack of its own budget has prevented GangTECC from funding its state and local law enforcement Executive Fellow program, limited its electronic communication and tracking capabilities, and limited its outreach efforts to other federal, state and local law enforcement agencies.

If GangTECC is to provide the services described in its operational plans, the Center will need a dedicated, annual operating budget. Other multi-agency enforcement centers, such as the Special Operations Division, EPIC, and OCDETF, have agency-sponsored funds made directly available to them that allow them to carry out their missions.[44] If the Department continues to view national anti-gang efforts as a priority and GangTECC as the best way to coordinate multi-agency anti-gang efforts, we believe it must seek more resources for the Center to allow it to fully achieve its mission.

[43] NGIC has included information about GangTECC in some of its pamphlets and brochures.

[44] EPIC is a multi-agency intelligence center that collects and disseminates information related to drug, alien, and weapon smuggling in support of field enforcement entities throughout the southwest region.

Recommendation

We recommend that:

7. The Department request a separate operating budget for GangTECC.

GangTECC lacks critical staff to provide guidance on gang investigations.

GangTECC's Concept of Operations states that, in addition to the Criminal Division attorneys initially assigned to GangTECC, "it is anticipated that the Gang Unit prosecutors will work closely with GangTECC." According to the Criminal Division's FY 2009 budget request, Gang Unit prosecutors are to "work hand-in-hand" with GangTECC and NGIC "to comprehensively target and coordinate multi-jurisdictional gang investigations and prosecutions and develop national strategies to disrupt and dismantle these dangerous organizations." However, we found that the Criminal Division has not assigned prosecutors to GangTECC and there are few instances in which GangTECC and the Gang Unit worked together.

<u>The Criminal Division has not assigned prosecutors to GangTECC</u>.

GangTECC's operational plan states that, in addition to providing a Director to GangTECC, the Criminal Division will assign one trial attorney on a full-time basis at the Center and that "additional prosecutors may be assigned to join GangTECC as the need arises." The trial attorney's duties were to (1) advise the agency representatives on legal matters, (2) assist the Director in his or her duties, and most importantly, (3) serve as an additional liaison between GangTECC and USAOs nationwide. The absence of an attorney to fulfill the liaison role between GangTECC and the USAOs has limited the Center's ability to coordinate with USAOs nationwide. A prosecutor's knowledge of USAO gang caseloads and strategies would assist GangTECC with case coordination and help GangTECC in resolving conflicts between different jurisdictions and agencies. The Criminal Division helped write and adopt the GangTECC operational plan. However, as of April 2009, the Criminal Division had not filled the trial attorney position or provided any other attorneys to GangTECC.

The presence of an attorney at GangTECC also would facilitate better interaction with the Criminal Division's Gang Unit. In the summer 2008, GangTECC members reported to OIG that it had very little interaction with Gang Unit attorneys. The Gang Unit Chief explained that interaction between Gang Unit prosecutors and GangTECC was hampered by the Gang Unit's shortage of prosecutors and a large caseload that requires Gang Unit attorneys to travel nationwide. As a result, Gang Unit prosecutors are not routinely available to work with GangTECC investigators. In May 2009, the GangTECC Director told the OIG that the Center's relationship with the Gang Unit had

improved from a year earlier. For example, he said Gang Unit attorneys are now working with GangTECC members to coordinate several cases. However, Gang Unit attorneys still do not typically spend time at GangTECC, attend any of GangTECC's staff meetings, and the two units occasionally have competing priorities.

According to the Gang Unit Chief, the Unit focuses on four particular gangs. In contrast, GangTECC investigates many different gangs, and GangTECC members told us that the Gang Unit may not always be interested in taking cases involving gangs other than the four it targets. We also found that there were no protocols that specify the nature of the coordination between GangTECC and the Gang Unit. GangTECC and the Gang Unit both have responsibilities related to the prosecution of gang cases and both entities receive requests for assistance with gang prosecutions from federal agents in the field. However, neither component has agreed on specific criteria to determine which gang cases should be referred to the Gang Unit. GangTECC personnel cited a problem in one case in February 2009 when GangTECC referred a national gang case to the Gang Unit for prosecution. Prior to accepting the case, the Gang Unit limited GangTECC's communication with the district's USAO staff that GangTECC found overly restrictive. We believe that GangTECC and the Gang Unit should develop written protocols that detail how the two groups will cooperate and coordinate their efforts.

In addition, four of the GangTECC customers (investigators) we interviewed said they needed guidance from prosecutors to get their cases prosecuted and suggested that GangTECC should facilitate their contact with an attorney. The Senior Counsel to the Criminal Division Assistant Attorney General told us the prosecutor's position in GangTECC had never been filled due to a lack of resources. The OIG believes that the addition of prosecutorial resources at GangTECC will enhance the Center's ability to assist with gang investigations and ultimately prosecutions.

Recommendations

We recommend that:

8. The Criminal Division assign and locate at GangTECC at least one full-time experienced prosecutor as discussed in GangTECC's Concept of Operations.

9. The Criminal Division and Governing Board direct GangTECC and the Gang Unit to jointly develop written protocols addressing: (a) how often and under what conditions GangTECC and the Gang Unit should meet to share information on gang-related cases; (b) what gang-related information should be regularly shared between the two

entities; (c) criteria for GangTECC to follow in referring gang cases to the Gang Unit; and (d) a method for determining which component will coordinate directly with the field office and district USAO.

Deconfliction by GangTECC is not occurring as directed by the Deputy Attorney General.

GangTECC is not serving as a national anti-gang deconfliction center as directed by the Deputy Attorney General. According to the GangTECC Director, effective deconfliction is required to avoid duplication of effort and to ensure resources are not wasted. Over its 3-year existence, however, GangTECC has not established itself as the central coordination center envisioned by its own Concept of Operations, which states that the Center will "provide a strong, national deconfliction center for gang operations." Moreover, the Department has not established policy to require that field component offices deconflict their gang cases through GangTECC, and few offices choose to do so. The following sections discuss GangTECC's attempts to implement an operational deconfliction process.

Participating GangTECC components and USAOs are not required to deconflict through GangTECC.

None of GangTECC's participating components require their field offices to notify GangTECC about newly opened gang cases. One component proposed an internal policy to require deconfliction with GangTECC. An FBI GangTECC member told us in March 2009 he drafted a policy that mandates FBI field offices use GangTECC to deconflict gang cases. The new policy would require field FBI investigators to notify GangTECC of new gang cases by including the FBI GangTECC representative in their electronic communications to FBI Headquarters. However, the proposed policy remains under review by FBI Headquarters officials. None of the other GangTECC components has implemented, or even proposed, a similar requirement.

We also noted that each of the 94 USAOs has designated an Anti-Gang Coordinator to provide leadership and focus to anti-gang efforts at the district level.[45] Although the Anti-Gang Coordinators work with local law enforcement and others to develop a comprehensive anti-gang strategy for their districts, they do not work with GangTECC – the Department entity created to develop that type of strategy. As a result, GangTECC is not notified when USAOs open or close gang cases.

[45] As part of the Department's anti-gang efforts, the Attorney General directed each United States Attorney to appoint an Anti-Gang Coordinator and to develop district-wide anti-gang strategies in January 2007. During 2008, the districts updated their anti-gang strategies and provided them to EOUSA.

Because neither the components' field offices nor the USAOs notify GangTECC about their gang investigations and cases, the Center cannot effectively deconflict the Department's anti-gang activities on a national level. We believe that requiring participating GangTECC components to notify GangTECC of newly opened gang cases in the field would be a significant step toward GangTECC addressing its deconfliction mission for the Department.

GangTECC suspended its pilot project to deconflict gang investigations.

In the absence of a Department requirement to notify GangTECC of anti-gang activities, in November 2008 GangTECC began a pilot project with NGIC to deconflict newly opened gang cases. The deconfliction process was intended to identify overlapping investigations and meet GangTECC's deconfliction responsibility. As described earlier, NGIC has not developed a gang database and therefore does not have the technology to query multiple data sources at once.

Instead, in the pilot project GangTECC members and NGIC analysts manually queried several databases. To accomplish this, GangTECC members generated lists every 30 days that contained the names and identifying information of targets of gang-related investigations opened in the prior 60 days. Each GangTECC member retrieved this information by querying their home agencies' databases. The lists of names generated were then provided to an NGIC analyst who ran the names through the databases of each participating component at NGIC.

The FBI was the first component to deconflict its gang targets for the pilot project. The initial FBI list contained over 500 names of individuals for whom the FBI had initiated investigations. When the NGIC analysts checked those names against the names of targets in four different member components' databases, the analysts obtained 221 "hits" (see text box). The analysts then informed the members of the respective components about the "hits." After a member from each component reviewed their respective component's cases, GangTECC began eliminating duplicates and aliases from the list. Through this exercise, GangTECC and NGIC analysts were able to identify that the FBI was investigating at least 38 gang targets who were also being investigated by another component or federal agency.

GangTECC Deconfliction Efforts (FBI Cases Only)

221 hits:
- 94 from DEA
- 65 from USMS
- 50 from ATF
- 12 from ICE

38 significant names

Although the manual deconfliction process identified some duplicate investigations, the GangTECC Director said it was too labor intensive. Consequently, he suspended the pilot project in April 2009. The GangTECC

Director told us that he met with the Special Operations Division and OCDETF in May 2009 to ask for assistance with deconfliction through analysis of communications data. OCDETF has a database that stores investigative information from multiple law enforcement agencies that could be used for deconfliction purposes, making the process less labor-intensive for NGIC analysts. As of June 2009, no agreement had been reached on OCEDTF's role in GangTECC's deconfliction process.

Early deconfliction of gang cases will maximize the use of resources and facilitate coordination of multi-jurisdictional gang investigations. The OIG believes the existence of a gang information management system is integral to GangTECC's meeting its deconfliction mission. Without a database and accurate knowledge of ongoing gang cases, GangTECC cannot effectively deconflict gang investigations.

Recommendations

We recommend that:

10. The Department require all participating GangTECC members report every newly opened gang-related investigation to GangTECC at the time the component opens the case.

11. The Department direct that each USAO notify GangTECC of each newly opened gang case immediately upon opening the case.

GangTECC's efforts to publicize its priority gang targets have lagged.

A primary GangTECC mission established in its operational plan is to develop an enhanced understanding of the national gang problem and propose strategies to neutralize the most violent and significant gang threats. In August 2006, GangTECC and NGIC identified 13 priority gang targets. During our interviews with GangTECC members in summer 2008, investigators stated that they were assigned specific gangs to monitor and had two on-going investigations involving priority targets.

Although GangTECC and NGIC shared the 13 priority targets with its Governing Board and the Department's Anti-Gang Coordinating Committee, it is unclear whether this information was shared with the rest of the law enforcement community, and we found little evidence regarding the use of this list beyond GangTECC and NGIC during our review.

In an effort to update the original list of 13 priority gang targets, GangTECC developed a new method to identify priority targets in the fall of 2008 which led to a new list of 17 priority gang targets. As of September 2009,

however, it had not shared the new list of 17 priority gang targets with the field. Separate from its effort to develop a list of priority gangs, in October 2007 GangTECC began to develop BOP targeting packages that identify inmates and their associates outside the prison system who engage in suspicious activities. The following sections describe GangTECC's efforts to identify the most serious gang threats.

GangTECC has developed a new method to identify priority targets.

GangTECC's operational plan calls for it to use information from NGIC and other sources to identify targets for investigations by field agents. Specifically, GangTECC's Concept of Operations states that the Center should "use the intelligence provided by NGIC and other sources to identify and recommend priority target groups, activities, geographic areas and individuals." The GangTECC Director said GangTECC's development of its Targeting Prioritization Project to update the existing list of 13 priority targets was delayed until September 2008 while NGIC worked with NDIC on the 2009 National Gang Threat Assessment, which was completed in November 2008.

GangTECC, with the assistance of NGIC, created a threat matrix that contained characteristics associated with each gang such as the gang's organization, its propensity for violent crime, the size of the gang, the types of weapons used by the gang, and whether the gang was involved in drug trafficking. The Centers then assigned point values to the characteristics in the matrix to develop a score corresponding to the relative threat posed by each gang, with a higher score indicating the gang was a greater threat relative to gangs with lower scores.

Once the Centers developed the threat matrix, GangTECC used information from the 2009 National Gang Threat Assessment as a source for information for its targeting project.[46] In February 2009, NGIC used the matrix to assign scores for the most reported gangs in the 2009 National Gang Threat Assessment. The gangs were assigned to one of two "tiers" based on their scores, with Tier 1 consisting of the two or three gangs that pose the greatest threat. According to the GangTECC Director, establishment of these tiers was intended to assist law enforcement agencies in each region with focusing their gang efforts on the most significant threats. Through its process, GangTECC identified 17 high priority gangs across the United States. Examples of high priority gangs identified by GangTECC include:

[46] In November 2008, NDIC and NGIC jointly completed the 2009 National Gang Threat Assessment. The Assessment provides an analysis of data collected from federal, state, and local law enforcement agencies about the nature of the gang problem in their areas. For the 2009 Assessment, the country was divided into seven regions and law enforcement personnel from each region identified the gangs they believed to be the most dangerous in their area.

- Gangster Disciples – This street gang is active in 110 cities and 31 states and has an estimated membership of 25,000 to 50,000. Their main source of income is the distribution of drugs, but the gang is also involved in other criminal activity, such as homicide, assault, auto theft, firearms violations, and money laundering.

- Sureños – This street gang is composed of members from various gangs who put aside former rivalries when they enter the prison system and unite under the name Sureños. Some members have direct links to Mexican drug trafficking organizations. Their main source of income is drug distribution within prison systems and in the community, as well as extortion of street-level drug distributors. They are also involved in other criminal activities such as assault, carjacking, home invasion, homicide, and robbery.

In April 2009, GangTECC shared the results of its prioritization assessment with its Governing Board, headquarters officials from its member agencies, EOUSA, and the Attorney General Anti-Gang Coordination Committee. However, as of September 2009, GangTECC had not shared the targeting results with the field. Although representatives from GangTECC's participating components received priority targeting results at the Board meeting, the information was not disseminated to their respective field offices.

In addition to these notifications, the GangTECC Director told the OIG that the priority target information will be disseminated to other law enforcement agencies through various presentations, including at Project Safe Neighborhood conferences. The Director stated that the information also will be distributed to state and local law enforcement in a tri-fold handout via mail, but he could not provide a timeframe on when this was to occur because GangTECC lacked the funds to design and print the brochure. According to the GangTECC Director, he would like to carry out the target prioritization process annually, but does not have an efficient method for collecting the requisite information on gang activity from law enforcement agencies.

Prior to identifying priority targets, GangTECC developed a strategy to identify outside targets that are potentially assisting criminal activity inside federal prisons. Specifically, GangTECC used information from BOP databases to develop "targeting packages" of information on gangs. The GangTECC/BOP Targeting Packages have successfully generated cases against gang members. According to the GangTECC Director, GangTECC is coordinating investigations on 5 of the 17 identified priority gangs.

GangTECC's lack of analytical support affects its ability to fully accomplish its targeting mission.

Because GangTECC does not have its own analytical capability, it is limited in its ability to independently identify priority targets and patterns that can be exploited by investigators. In addition, it cannot create strategic or tactical products for the field. The Deputy Attorney General's memorandum creating GangTECC required the participating member components to provide investigators, not analysts. Since investigators are not trained to perform the same type of work as analysts, the GangTECC Director told the OIG that the Center's targeting efforts were reliant upon NGIC's analytical resources.

This is consistent with the reason the two Centers were co-located - to facilitate interagency cooperation and gang-related information sharing. Despite the Centers collaborative efforts to identify priority targets, we found that gang information was rarely shared between GangTECC and NGIC. For example, in the summer 2008 several NGIC analysts and managers told the OIG that they were unfamiliar with GangTECC's mission. Also, half of GangTECC members stated they did not share any information with NGIC. We also believe that the efforts to inform the field of the priority targets could have occurred in a more timely fashion if the Centers had collaborated to do so.

We also note that unlike other multi-agency federal law enforcement centers, GangTECC does not have its own analytical resources. Other multi-agency entities such as the DEA's Special Operations Division and EPIC have analysts who are trained to provide strategic and operational support to the investigators. The Director of the Special Operations Division told the OIG that the Special Operations Division's investigators and analysts work in teams to facilitate better communication. The investigators direct the investigation and the analysts use databases, charts, and other information to show links between cases. In contrast, communication between NGIC analysts and GangTECC agents is disjointed when it occurs.

To assist Departmental anti-gang activities, GangTECC should develop a plan to improve how it identifies priority targets for the field and disseminate the information it develops in a timely manner. GangTECC has developed plans for targeting 4 priority targets, but must also develop additional strategies to address its remaining 13 priority targets. However, to carry out any such strategies or initiatives, GangTECC will need to address its lack of analytical support or develop a better working relationship with NGIC.

Recommendations

We recommend that:

12. GangTECC and NGIC (a) immediately disseminate information on the 17 gangs that they have identified as posing the greatest threat, and (b) develop a plan for periodically updating and disseminating information on high-threat gangs.

13. GangTECC and NGIC develop law enforcement strategies and initiatives to address the additional identified priority targets.

14. GangTECC and NGIC increase the use of NGIC's analytical resources to support GangTECC's targeting mission.

NGIC AND GANGTECC ARE NOT EFFECTIVE AS INDEPENDENT ENTITIES

NGIC and GangTECC are not operating effectively despite being co-located. We found that their separate management structures have hindered their ability to coordinate and communicate. As a result, the two centers do not provide a "one-stop shopping" capability that was envisioned and currently advertised.

The effectiveness of NGIC and GangTECC to contribute to the Department's anti-gang initiatives is dependent upon their working together to achieve common goals, which include deconflicting gang investigations, identifying priority targets, and sharing gang information. However, the OIG found that several factors, discussed in the sections above, impair their ability to achieve their common goals and contribute to the Department's anti-gang initiatives. We believe that the Department should consider merging the two organizations.

Both NGIC and GangTECC advertise at conferences and in their pamphlets that they provide investigators and prosecutors with a "one-stop shopping" capability for gang information and assistance. This capability has not been achieved, in part, because the Centers' separate management structures are not conducive to achieving these goals. These organizations have different approaches to funding, staffing requirements, and investigative priorities that prevent an effective partnership between the two Centers. Co-location of NGIC and GangTECC was not enough to overcome these differences in order for an effective partnership to occur.

Instead, NGIC and GangTECC communicate on an ad hoc and limited basis. For example, GangTECC members told the OIG that they did not communicate with NGIC analysts on a regular basis. In addition, some GangTECC personnel we interviewed were unfamiliar with NGIC's intelligence products, while other GangTECC personnel found NGIC intelligence products useful only for general background information for their investigations.

The lack of coordination between the Centers was recognized by some NGIC and GangTECC personnel we interviewed. For example, one NGIC staff member stated that the two organizations did not work together as much as he expected given their close proximity to one another and their similar goals and objectives. In addition, an NGIC analyst stated that the operations of the two organizations are not cohesive and that the Centers did not mesh together structurally. A GangTECC agent voiced similar thoughts, stating that GangTECC needed to find a direction in concert with NGIC, and that there was not enough coordination between the two entities.

Combining the two organizations under a single Department entity could facilitate a common vision for the two organizations and a more uniform approach to assisting gang investigations, create a better joint operating environment, and provide for a more reliable resource stream to support the Centers' missions. A merger also would enable the Centers to move closer to providing the "one-stop shopping" capability that was envisioned and is advertised. We therefore believe that the Department should consider merging NGIC and GangTECC into a single unit under common leadership.

While a merger of the Centers will provide a more uniform approach to assisting gang investigations and prosecutions, merger alone is insufficient to assure a major contribution to the Department's anti-gang initiatives. Major improvements are needed in the areas discussed in this report if the Centers are to effectively coordinate and support gang investigators and prosecutors nationwide.

Recommendation

We recommend that:

15. The Department consider merging NGIC and GangTECC.

CONCLUSION AND RECOMMENDATIONS

NGIC and GangTECC were created to be the Department's national intelligence and coordination mechanisms, respectively, for gang-related investigations and prosecutions. However, we found that after more than 3 years, the Centers have not significantly improved the coordination and execution of the Department's anti-gang initiatives. Although the Centers were co-located to facilitate interagency cooperation, collaboration, and gang-related information sharing, they are not effectively doing so. Many factors contributed to the Centers' inability to make a significant impact on the Department's anti-gang activities.

For example, we found that because of poor performance by a contractor and technological challenges associated with establishing electronic bridges between disparate state and local databases, NGIC has not established a gang information database for collecting and disseminating gang intelligence as directed by Congress. We believe that development of a gang information management system is crucial to support the Department's anti-gang initiatives and must be achieved as soon as possible.

Although the NGIC and GangTECC partnership was created to provide investigators and prosecutors with "one-stop shopping" for gang information and assistance, that has not occurred. For example, because GangTECC's member agencies and USAOs are not required to inform GangTECC of their investigations and prosecutions, GangTECC cannot effectively deconflict the Department's gang-related activities as directed by the Deputy Attorney General. Also, the Criminal Division has not filled an attorney position intended to enable GangTECC to provide guidance to law enforcement officials conducting gang investigations and prosecutions. GangTECC's efforts to publicize priority gang targets have lagged.

NGIC is perceived as predominately an FBI organization, and it does not effectively share gang intelligence and information with other law enforcement organizations. Overall, in the 38-month period we examined, NGIC received only 213 requests for information – about 6 requests a month. Moreover, the preponderance of FBI and internal requests suggests that the NGIC remains primarily focused on FBI investigations and has not become the national resource on gang intelligence for federal, state, and local law enforcement as envisioned. Also, NGIC's intelligence products have limited usefulness to its customers. We believe this is due in part to the Center's failure to monitor its customers' needs or satisfaction with its products and services.

We also found that, although the Centers were co-located to facilitate interagency cooperation, collaboration, and gang-related information sharing, NGIC and GangTECC have made only limited use of each others' resources.

Furthermore, services and communication between the two Centers' personnel occur only on an ad hoc basis.

Finally, although GangTECC was assigned a broad, multi-purpose mission, it has no operating budget. This has prevented GangTECC managers from taking actions essential to GangTECC's operations. Among other things, GangTECC has been limited in its ability to host case coordination meetings and conduct effective outreach to the law enforcement community.

Since co-location of the Centers has proven insufficient to ensure that their common goals are met, the OIG recommends that the Department consider merging NGIC and GangTECC into a single unit under common leadership. Merging the Centers could improve their ability to support and coordinate the Department's anti-gang initiatives at a national level by reducing incompatibilities that result from the current organizational alignment, creating a better joint operating environment, and providing for a more reliable resource stream to support the Centers' mission.

However, while we believe that merging the Centers could improve their ability to assist gang investigations and prosecutions, merger alone is insufficient to support the Department's anti-gang initiatives. Major improvements are needed in the areas discussed in this report if the Centers are to effectively coordinate and support gang investigators and prosecutors nationwide. We therefore make 15 recommendations to help improve the NGIC's and GangTECC's missions of assisting federal, state, and local law enforcement to address violent regional and national gangs.

Recommendations

We recommend that:

1. NGIC establish a working group composed of representatives from its member agencies and state and local law enforcement to identify methods for sharing gang-related intelligence across the law enforcement community. This working group should address, among other issues: (a) a definition of "gang" and criteria for identifying gang membership; and (b) data standards for entering gang information into databases.

2. NGIC create an implementation plan that identifies functional requirements with milestone dates to procure a gang information management system.

3. NGIC analyze the responses to past customer surveys on intelligence products to identify improvements that would make its intelligence products more useful to customers.

4. NGIC expand its customer satisfaction surveys to include recipients of all of its products and services.

5. NGIC analyze the types of information being requested and the time spent responding to each request type to better allocate its resources.

6. NGIC track all of requests for information that it receives.

7. The Department request a separate operating budget for GangTECC.

8. The Criminal Division assign and locate at GangTECC at least one full-time experienced prosecutor as discussed in GangTECC's Concept of Operations.

9. The Criminal Division and Governing Board direct GangTECC and the Gang Unit to jointly develop written protocols addressing: (a) how often and under what conditions GangTECC and the Gang Unit should meet to share information on gang-related cases; (b) what gang-related information should be regularly shared between the two entities; (c) criteria for GangTECC to follow in referring gang cases to the Gang Unit; and (d) a method for determining which component will coordinate directly with the field office and district USAO.

10. The Department require all participating GangTECC members report every newly opened gang-related investigation to GangTECC at the time the component opens the case.

11. The Department direct that each USAO notify GangTECC of each newly opened gang case immediately upon opening the case.

12. GangTECC and NGIC (a) immediately disseminate information on the 17 gangs that they have identified as posing the greatest threat, and (b) develop a plan for periodically updating and disseminating information on high-threat gangs.

13. GangTECC and NGIC develop law enforcement strategies and initiatives to address the additional identified priority targets.

14. GangTECC and NGIC increase the use of NGIC's analytical resources to support GangTECC's targeting mission.

15. The Department consider merging NGIC and GangTECC.

APPENDIX I: METHODOLOGY OF THE OIG REVIEW

We conducted in-person and telephone interviews, performed data analyses and document reviews, and observed information systems and database demonstrations. We also observed an NGIC criminal analytic training conference and visited the DEA's Special Operations Division facility. In addition, we coordinated with the U.S. Government Accountability Office (GAO), which was conducting both domestic and international gang reviews concurrently with this OIG review, to ensure that our review was not duplicative of GAO's.

Interviews

NGIC and GangTECC. We interviewed NGIC and GangTECC personnel to learn about their roles and responsibilities and how the two Centers interact with each other. At NGIC, we interviewed the Director, Deputy Director, 2 supervisory intelligence analysts, 14 intelligence analysts, 1 program analyst, and 1 former law enforcement fellow. We also interviewed three newly assigned NGIC personnel from CBP and DoD. In March 2009, we conducted follow-up interviews with six NGIC analysts to assess whether changes in operations had occurred since our initial interviews.

At GangTECC, we interviewed the Director, Deputy Director, and 12 GangTECC members (11 investigators and 1 intelligence officer). We also conducted follow-up interviews with six GangTECC members to assess whether changes had occurred since our initial interviews.

Department Components. We interviewed officials from the Department's federal law enforcement components listed below to discuss their programs and methods for investigating gang crime and how they interact with NGIC and GangTECC. We also interviewed personnel from the Criminal Division, Office of the Deputy Attorney General (ODAG), the Executive Office for the United States Attorneys (EOUSA), and the Justice Management Division (JMD) to gather information about the creation of both Centers, oversight mechanisms in place, prosecution of gang crime, and NGIC and GangTECC's budgets. The following is a list of the staff we interviewed at each component:

- ATF – We interviewed personnel from the Field Management Staff, the Office of Training and Professional Development, the Firearms Division, Field Intelligence, the Office of Strategic Intelligence and Information, and the Firearms Enforcement Branch. We also interviewed ATF field personnel who received assistance from GangTECC.

- DEA – We interviewed DEA field personnel who received assistance from GangTECC.

- FBI – We interviewed the former Section Chief of the Gang/Criminal Enterprise Section, the Chief of the MS-13 National Gang Task Force, FBI budget personnel to obtain an understanding of NGIC's budget, and FBI field personnel who received assistance from NGIC and GangTECC.

- USMS – We interviewed the Chief Inspector of Task Force Operations in the Investigative Services Division, a Senior Inspector located at the BOP's Sacramento Intelligence Unit, and a USMS field representative who received assistance from GangTECC.

- Criminal Division – We interviewed the former Deputy Assistant Attorney General, the former Senior Counsel to the Assistant Attorney General, the Gang Unit Chief, and the Acting Director of Resource Planning and Evaluation regarding budget requests made on behalf of GangTECC.

- ODAG – We spoke with the current and two former Chairs of the Attorney General's Anti-Gang Coordination Committee and a former Senior Counsel to the Deputy Attorney General.

- EOUSA – We interviewed the Counsel for Legal Initiatives and an attorney detailed to the National Anti-Gang Coordinator position.

- JMD – We obtained budget information about GangTECC from the Deputy Assistant Attorney General Controller in JMD and staff from the JMD's budget office.

- DEA's Special Operations Division - We gathered information about the DEA's Special Operations Division creation, structure, operation, and its interaction with the field and GangTECC. In addition, managers from the Special Operations Division and the Organized Crime Drug Enforcement Task Force (OCDETF) Fusion Center explained to OIG evaluators how these two organizations interact with each other.[47] We compared the Special Operations Division organization (another multi-agency component) with that of the two Centers to determine if there were "lessons learned" that could be adopted by NGIC and GangTECC.

[47] OCDETF is a multi-agency center led by the DEA. OCDETF's primary mission is to identify, disrupt, and dismantle the most serious drug trafficking and money laundering organizations and those primarily responsible for the nation's drug supply.

Non-Department Personnel. We conducted telephone interviews with personnel from the following state, local, and international law enforcement agencies who received assistance from NGIC and GangTECC from 2006 to 2008 in order to collect data on the services each Center provided to its customers: (1) Prince William County Police Department in Virginia, (2) Houston Police Department in Texas, (3) Bucks County Department of Corrections in Pennsylvania, (4) Wyandotte Police Department in Michigan, (5) Society Hill Police Department in South Carolina, (6) Royal Canadian Mounted Police in Canada, and (7) Europol office in Washington, D.C. We also conducted a telephone interview with a representative from the Chicago Legal Aid Office in Illinois who had requested assistance from NGIC.

Data Analyses

We analyzed NGIC's workload to identify any trends and patterns in the type of work being done at the Center. We also analyzed customer satisfaction surveys returned to NGIC. In addition, we reviewed logbooks in which some GangTECC members manually record work they performed. Finally, we performed analyses to identify trends and patterns in NGIC and GangTECC customer bases.

NGIC. We analyzed NGIC's Request for Information database for the period of January 1, 2006, to February 19, 2009, to determine the number and types of requests NGIC received by fiscal year, the entities that submitted the requests, the length of time NGIC took to process the requests, and which NGIC personnel processed the requests.

We analyzed interview responses for selected NGIC customers regarding customer opinions of the services or assistance received, how the services or assistance received was used by the customers, and what other NGIC services or assistance the customers would have found useful. We selected every fourth NGIC customer entered in the NGIC's database for interview. Of the 33 customer entries selected, we analyzed customer responses for 27 entries. We were unable to reach the customers for the remaining 6 entries.

We also reviewed customer satisfaction surveys returned to NGIC during the period January 2006 to March 2007. We reviewed the surveys to determine the average scores given by NGIC customers on the quality and value of NGIC intelligence products that they received. We analyzed additional comments given by NGIC customers regarding the intelligence products that were used to identify patterns and trends.

GangTECC. Some GangTECC members record the work they perform in one or more of the four logbooks that represent GangTECC's four goals described in the Background section of our report. Entries are made in the

corresponding logbook based on the task or service a member performed. We reviewed the 363 entries made in the logbooks from January 1, 2008, through July 31, 2008.

We selected the customer for every tenth logbook entry, which yielded 36 customers, whom we then attempted to contact. We analyzed customer responses for the 24 customers who completed our telephone interviews regarding the types of services or assistance received, how they used the services or assistance they received, what other services the customers would like from GangTECC, and their awareness of GangTECC services in the field.

Information Systems

NGIC and GangTECC personnel provided demonstrations of the various agency-specific information systems and databases they use in their daily work. In addition, we were given access to the FBI's LEO network where NGIC maintains a Special Interest Group for subscribers to share gang information and where NGIC posts its intelligence assessments, bulletins, and information papers.

Document Review

We reviewed Attorney General and Deputy Attorney General documents that established GangTECC. We also examined internal and congressional documents related to NGIC's budget authorization and appropriations and GangTECC's budget requests.

We reviewed the Concepts of Operations for both Centers and analyzed the Centers' effectiveness in meeting the goals and objectives established for them by the Governing Board. We also reviewed NGIC's organizational structure, examples of intelligence products, internal reports on the effectiveness and efficiency of NGIC operations, outreach efforts, and training material. We assessed GangTECC's communication policies and procedures; examples of GangTECC services, outreach efforts, and success stories; and the logbooks used to track customer requests and workload.

We also reviewed information provided by the participating Department's agencies and components pertaining to their respective gang-related law enforcement operations and initiatives, gang investigation tracking methods, and gang-related performance measurements so that we could assess the availability of gang data and refine our review plan.

APPENDIX II: NGIC PUBLIC LAW

SEC. 1107. NATIONAL GANG INTELLIGENCE CENTER.

28 USC 534 note.

Records.

(a) ESTABLISHMENT.—The Attorney General shall establish a National Gang Intelligence Center and gang information database to be housed at and administered by the Federal Bureau of Investigation to collect, analyze, and disseminate gang activity information from—

(1) the Federal Bureau of Investigation;

(2) the Bureau of Alcohol, Tobacco, Firearms, and Explosives;

(3) the Drug Enforcement Administration;

(4) the Bureau of Prisons;

(5) the United States Marshals Service;

(6) the Directorate of Border and Transportation Security of the Department of Homeland Security;

(7) the Department of Housing and Urban Development;

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(8) State and local law enforcement;

(9) Federal, State, and local prosecutors;

(10) Federal, State, and local probation and parole offices;

(11) Federal, State, and local prisons and jails; and

(12) any other entity as appropriate.

(b) INFORMATION.—The Center established under subsection (a) shall make available the information referred to in subsection (a) to—

(1) Federal, State, and local law enforcement agencies;

(2) Federal, State, and local corrections agencies and penal institutions;

(3) Federal, State, and local prosecutorial agencies; and

(4) any other entity as appropriate.

(c) ANNUAL REPORT.—The Center established under subsection (a) shall annually submit to Congress a report on gang activity.

(d) AUTHORIZATION OF APPROPRIATIONS.—There are authorized to be appropriated to carry out this section $10,000,000 for fiscal year 2006 and for each fiscal year thereafter.

APPENDIX III: NGIC CONCEPT OF OPERATIONS (EXCERPT)

Goal 1: Establish and maintain an FBI-facilitated multi-agency NGIC.

- Objective: Establish cooperation and/or participation from the ATF, BOP, DEA, DOJ, ICE, NDIC, RISS, and USMS in staffing the NGIC through the assignment of Intelligence Analytical personnel and/or the provision of data or other support

- Objective: Develop a Memorandum of Understanding (MOU) with each participating agency.

- Objective: Coordinate with the Office of Congressional Affairs, or agency equivalent, to seek Congressional funding for federal agency support to the NGIC.

- Objective: Coordinate with RISS to promote effective information flow and information sharing between the NGIC and the federal, state, local, and tribal law enforcement community.

Goal 2: Research, acquire, and implement technology to manage the exchange of gang information among federal, state, local, and tribal law enforcement agencies.

- Objective: Coordinate with participating agencies to research and identify in-house or commercial technology available to the NGIC for the efficient collection, storage, and manipulation of federal, state, local, and tribal gang information.

- Objective: Establish an information exchange backbone and leverage existing networks.

- Objective: Through available technology, establish "electronic bridges" to federal, state, and local IT systems.

Goal 3: Provide the law enforcement community with a "one-stop-shop" mechanism for quick-checks or data calls to support law enforcement requests for information regarding suspected or known gangs and/or gang members.

- Objective: Develop and implement NGIC protocols to provide a timely and comprehensive response to requests for information, representing a coordinated integration of participating agencies' information.

- Objective: Create a centralized data management system within the NGIC for all relevant gang intelligence collected through normal operations of the NGIC, and public source information collected as permitted by statute and policy. NGIC does not intend to create a national gang database.

- Objective: Create and maintain a current, comprehensive library of gang identification symbols, clothing, signs, tattoos, codes, writings, graffiti, and philosophies through the collection of raw intelligence and investigative information voluntarily submitted by the law enforcement community.

- Objective: Consult with Counsel's offices of all participating agencies and the DOJ on legal issues regarding information sharing of intelligence and investigative information.

Goal 4: Conduct timely research and analysis which seeks to identify and neutralize emerging trends of the most violent gangs.

- Objective: Identify National Gang Collection Priorities (NGCP's) for the purposes of collecting intelligence on domestic and transnational gangs that pose a significant multi-jurisdiction threat and that adversely impact many communities through violence, drug distribution, and recruitment of local youth.

- Objective: Identify trends and patterns of both domestic and transnational gang activities as they relate to issues of national security, border protection, and public safety.

- Objective: Produce actionable coordinated tactical and/or strategic intelligence products (including, but not limited to: Intelligence Assessments, Intelligence Bulletins, both Regional and National Threat Assessments, Target Support Packages, and Information Papers), using sophisticated technical and analytical tools, to support the initiation and enhancement of gang investigative efforts.

- Objective: Implement biometrics to include facial recognition capabilities within the NGIC and interface with state, local, and tribal agencies.

Goal 5: Provide analytic support to law enforcement investigations, operational/intelligence initiatives, and issues of immediate concern.

- Objective: Assist the Gang Targeting Enforcement and Coordination Center (GangTECC) and law enforcement agencies in prioritizing targets

for investigation and prosecution, devising investigative strategies, and allocating resources to address gang problems.

Goal 6: Provide intelligence support for GangTECC and other law enforcement agencies to deconflict and coordinate gang related investigations and prosecutions.

- Objective: Establish a relationship between the NGIC and GangTECC, to include the co-location of the two entities.

- Objective: Through requests for information and relational analyses of pending and closed gang investigations reported to the NGIC, develop and implement procedures to identify conflict and report, as appropriate, to GangTECC.

Goal 7: Develop and maintain strong partner and customer relations to maximize analytical and information exchange efforts.

- Objective: Assist United States and foreign law enforcement, whenever possible, in identifying those gangs posing the greatest threat through information-sharing forums and dissemination of various intelligence products.

- Objective: Host workshops and in-service training focusing on specific priority groups, geographical regions, and/or specific gang issues.

- Objective: Establish a Law Enforcement Fellows Program allowing state and/or local sworn and analytical personnel to work in the NGIC for a six-month period of time, to foster state and local law enforcement ties.

APPENDIX IV: GANGTECC CONCEPT OF OPERATIONS (EXCERPT)

Goal 1: Assisting the initiation of gang-related investigations and enhancing existing investigations and prosecutions.

- Objective: GangTECC will proactively identify and disseminate case-specific intelligence to federal, state and local law enforcement that can be used to support gang-related investigations and prosecutions.

- Objective: GangTECC will facilitate the development of targeted strategic and tactical products designed specifically to support investigations and prosecutions.

- Objective: GangTECC will collect and share gang-related intelligence, analysis and targeting information, in cooperation with originating agencies and existing practices.

- Objective: GangTECC will provide additional assistance to law enforcement and prosecutors as requested and as appropriate, given resources and priorities.

Goal 2: Aiding in coordination, deconfliction, and effectiveness of gang-related initiatives, investigations and prosecutions.

- Objective: GangTECC will identify appropriate opportunities for inter-agency and inter-district coordination and will help link together local investigations and prosecutions into coordinated, strategic, inter-agency, inter- jurisdictional enforcement operations, consistent with existing authorities and practices of the Departments of Justice and Homeland Security.

- Objective: GangTECC will help to connect investigators and prosecutors to resources and intelligence outside their districts.

- Objective: To identify cross-district and cross-agency linkages, GangTECC will coordinate closely with, and will rely on the capabilities of, existing entities such as Special Operations Division (SOD) and ATF's National Tracing Center.

- Objective: GangTECC will assist in resolving conflicts between different jurisdictions and agencies when their investigations or prosecutions overlap.

Goal 3: Developing an enhanced understanding of the national gang problem and propose strategies to neutralize the most violent and significant threats.

- Objective: GangTECC will use the intelligence provided by the National Gang Intelligence Center (NGIC) and other sources to identify and recommend priority target groups, activities, geographic areas and individuals.

- Objective: GangTECC will use intelligence generated by the NGIC, as well as independent assessments of gang-related drug trafficking, firearms trafficking, and other interstate and international criminal activities, including the fugitive status of gang members, to help identify patterns that can be exploited by investigators and prosecutors.

- Objective: GangTECC will help develop strategies and initiatives that address those priority targets.

Goal 4: Coordinating with and supporting the NGIC.

- Objective: The interagency NGIC has as its core mission the collection, analysis and dissemination of gang-related intelligence. GangTECC will co-locate with the NGIC and will serve as a major customer of the intelligence products of the NGIC.

- Objective: GangTECC will share information with NGIC on its identified priority target recommendations, and will focus and prioritize intelligence collection and analysis through taskings and other guidance to the NGIC.

- Objective: GangTECC will help ensure that case-related intelligence in the field is being shared with the NGIC in a timely manner.

- Objective: GangTECC will work with the NGIC to address any problems inherent in the collection of gang-related intelligence from the field or other Centers.

APPENDIX V: DEPUTY ATTORNEY GENERAL MEMORANDUM

U.S. Department of Justice

Office of the Deputy Attorney General

The Deputy Attorney General

Washington, D.C. 20530

July 25, 2006

MEMORANDUM FOR ASSISTANT ATTORNEY GENERAL, CRIMINAL DIVISION
DIRECTOR, EXECUTIVE OFFICE FOR UNITED STATES ATTORNEYS
DIRECTOR, FEDERAL BUREAU OF INVESTIGATION
DIRECTOR, BUREAU OF ALCOHOL, TOBACCO, FIREARMS, AND EXPLOSIVES
ADMINISTRATOR, DRUG ENFORCEMENT ADMINISTRATION
DIRECTOR, FEDERAL BUREAU OF PRISONS
DIRECTOR, UNITED STATES MARSHALS SERVICE
DIRECTOR, NATIONAL GANG TARGETING, ENFORCEMENT, AND COORDINATION CENTER
DIRECTOR, NATIONAL GANG INTELLIGENCE CENTER
CHIEF INFORMATION OFFICER, DEPARTMENT OF JUSTICE
CHIEF INFORMATION OFFICER, FEDERAL BUREAU OF INVESTIGATION
CHAIR, ATTORNEY GENERAL'S ANTI-GANG COORDINATION COMMITTEE

FROM: Paul J. McNulty PJM
Deputy Attorney General

SUBJECT: Establishment of the National Gang Targeting, Enforcement & Coordination Center (GangTECC) and Governing Board of GangTECC and the National Gang Intelligence Center

I. Establishment of the National Gang Targeting, Enforcement & Coordination Center

On February 15, 2006, the Attorney General announced plans to create a new national anti-gang task force as part of his initiative to combat gangs and gang violence across America. The Attorney General envisioned a task force that would create law enforcement strategies and facilitate operations across agency lines aimed at dismantling national and trans-national violent gangs. This task force would also coordinate overlapping investigations, ensure that tactical and strategic intelligence is shared between law enforcement agencies, and serve as a central coordinating center for multi-jurisdictional gang investigations involving federal law enforcement agencies.

On June 26, 2006, the National Gang Targeting, Enforcement & Coordination Center (GangTECC) began operations. In accordance with the Attorney General's direction, Gang-TECC is a multi-agency center that will serve as a critical catalyst in a unified federal effort to help disrupt and dismantle the most violent gangs in the United States. GangTECC will be co-located with the National Gang Intelligence Center (NGIC), which is temporarily housed in Washington, DC, at the FBI Headquarters. GangTECC will work in close coordination with the NGIC, and will be a primary consumer of NGIC intelligence. Specifically, GangTECC will:

- Assist the initiation of gang-related investigations and enhance existing investigations and prosecutions;
- Aid in coordination, deconfliction, and effectiveness of gang-related initiatives, investigations and prosecutions;
- Develop an enhanced understanding of the national gang problem and propose strategies and targets to neutralize the most violent and significant threats; and
- Coordinate with and support the National Gang Intelligence Center.

GangTECC is managed by a Director, selected by the Assistant Attorney General for the Criminal Division, and supported by an interagency team of Federal agents and prosecutors. The following agencies currently participate in GangTECC:

Bureau of Alcohol, Tobacco, Firearms and Explosives
Criminal Division
Drug Enforcement Administration
Federal Bureau of Investigation
Federal Bureau of Prisons
United States Marshals Service
Bureau of Immigration and Customs Enforcement, Department of Homeland Security

Given state and local law enforcement's critical expertise in combating gangs, I hereby direct the Director of GangTECC to explore all available options for ensuring state and local law enforcement representation in GangTECC. Additional participants may be added as appropriate.

To ensure consistent Department participation in GangTECC, I further direct the Bureau of Alcohol, Tobacco, Firearms and Explosives and the Federal Bureau of Investigation to assign at least two experienced agents full time to GangTECC, effective July 2006. The Drug Enforcement Administration and United States Marshals Service shall assign at least one experienced agent, and the Federal Bureau of Prisons shall assign at least one experienced representative, full time to GangTECC, effective July 2006. Agents assigned to GangTECC shall be subject to approval by the Assistant Attorney General for the Criminal Division.

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Combating the threat of violent criminal gangs is one of the Department's top priorities. I appreciate the work undertaken by Department agents and prosecutors, our interagency partners from the Department of Homeland Security, and representatives from various intelligence and investigative associations that has provided the platform from which this coordination center could be launched. These next few months are critical to ensuring successful operations of this center, and I ask that all Department components and agencies commit to supporting this effort.

II. Establishment of the Governing Board of GangTECC and the National Gang Intelligence Center

On July 28, 2005, Deputy Attorney General James B. Comey established the Governing Board of the National Gang Intelligence Center (NGIC). The close relationship and coordination between GangTECC and the NGIC now counsels for expansion of that Governing Board to oversee the activities of both entities.

Therefore, to ensure the most effective coordination of anti-gang efforts by the Department, there is hereby established the National Gang Intelligence and Coordination Center Governing Board ("Governing Board"). The Director, NGIC, and the Director, GangTECC, shall co-chair the Governing Board.

The Governing Board shall have the following members:

Director, Federal Bureau of Investigation
Director, Bureau of Alcohol, Tobacco, Firearms, and Explosives
Assistant Attorney General, Criminal Division
Administrator, Drug Enforcement Administration
Director, Executive Office for United States Attorneys
Director, Federal Bureau of Prisons
Director, United States Marshals Service
Director, National Gang Intelligence Center
Director, National Gang Targeting, Enforcement & Coordination Center
Chief Information Officer, Department of Justice
Chief Information Officer, Federal Bureau of Investigation
Chair, Subcommittee on Violent and Organized Crime, Attorney General's Advisory Committee
Chair, Attorney General's Anti-Gang Coordination Committee

A member of the Governing Board may designate any person who is part of the member's component or committee to perform the duties of the member on the Governing Board. The Board may add such other members, invitees, or participants as it deems appropriate.

The Governing Board shall approve policies and procedures for the NGIC and GangTECC, including, but not limited to, the concept of operations and any necessary standard operating procedures for the two entities. The Governing Board shall ensure that all NGIC and GangTECC policies and procedures are consistent with the anti-gang policies established by the Attorney General, the Deputy Attorney General, and the Attorney General's Anti-Gang Coordination Committee (the Committee).

The Governing Board shall meet within 30 days of the date of this memorandum and thereafter at the call of the co-chairs, but not less than once quarterly.

No later than 90 days from the date of this memorandum, the Governing Board shall submit a written report to the Committee updating the progress on the governing documents for both the NGIC and GangTECC, and reporting on the activities of each. No later than 180 days from the date of this memorandum, the Governing Board shall submit a written report to the Committee outlining plans for relocating the NGIC and GangTECC to a new location recommended by the Governing Board. In reviewing potential locations, the Governing Board shall consider co-location with the Special Operations Division in Chantilly, Virginia. The relocation shall proceed with all deliberate speed, and shall occur no later than March 31, 2007. Thereafter the Governing Board shall submit an annual report to the Committee detailing the activities and successes of both the NGIC and GangTECC, no later than the last day of each fiscal year.

To the extent this memorandum conflicts with the July 28, 2005, Deputy Attorney General's memorandum establishing the Governing Board of the NGIC, this memorandum controls.

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APPENDIX VI: GLOSSARY

AGCC	Attorney General's Anti-Gang Coordination Committee
ATF	Bureau of Alcohol, Tobacco, Firearms and Explosives
BOP	Federal Bureau of Prisons
CBP	Customs and Border Protection (Department of Homeland Security)
DEA	Drug Enforcement Administration
DoD	Department of Defense
EOUSA	Executive Office for United States Attorneys
EPIC	El Paso Intelligence Center
FBI	Federal Bureau of Investigation
GangTECC	National Gang Targeting, Enforcement, and Coordination Center
GAO	Government Accountability Office
HIDTA	High Intensity Drug Trafficking Areas
ICE	Immigration and Customs Enforcement (Department of Homeland Security)
JMD	Justice Management Division
LEAP	Leadership Excellence and Achievement Program
LEO	Law Enforcement Online
NDIC	National Drug Intelligence Center
NGIC	National Gang Intelligence Center
OCDETF	Organized Crime Drug Enforcement Task Force
ODAG	Office of the Deputy Attorney General

ONDCP	Office of National Drug Control Policy
RICO	Racketeer Influenced and Corrupt Organizations Act
RISS	Regional Information Sharing Systems
USAO	United States Attorney's Office
USMS	U.S. Marshals Service

APPENDIX VII: DEPARTMENT'S RESPONSE

U.S. Department of Justice

Office of the Deputy Attorney General

Washington, D.C. 20530

November 10, 2009

MEMORANDUM

TO: Michael D. Gulledge
Assistant Inspector General for Evaluation and Inspection
Office of the Inspector General

FROM: Jennifer Shasky Calvery JSC/by SNS
Senior Counsel
Office of the Deputy Attorney General

SUBJECT: Joint Response to the OIG's Draft Report: "A Review of the Department's Anti-Gang Intelligence and Coordination Centers"

The Office of the Deputy Attorney General (ODAG) very much appreciates the opportunity to review and respond to the Office of the Inspector General's drat audit report entitled, "A Review of the Department's Anti-Gang Intelligence and Coordination Centers" (hereinafter, "Report"). This memorandum will serve as the joint response to the Report on behalf of the Criminal Division, the Federal Bureau of Investigation (FBI), and the ODAG.

The Department of Justice is highly committed to leading the effort to combat the public safety threat posed by national and international gangs. We are equally committed to providing effective and comprehensive gang intelligence and coordination services to support enhanced gang investigations and prosecutions nationwide.

The Report documents the Department's challenges in achieving the maximum impact at the national level against the most violent gangs in the United States, and providing investigators and prosecutors with one integrated source for gang information and assistance. The Department agrees with the concept of the recommendations that are reflected in the body of the Report and is taking steps to address each of those recommendations. At the same time, we recognize, and have discussed with OIG staff, that we are considering organizational changes that might modify how we implement those recommendations in order to achieve the most effective resolution to the matters under review.

Notwithstanding the challenges, it also bears noting that the Department's anti-gang intelligence and coordination centers have been working together and within two months of working together, the centers jointly identified 13 priority gang threats. Accordingly, they have certainly established a foundation upon which to build further success. Addressing the identified challenges will only serve to enhance their overall effectiveness and increase their impact on the gang problem in this country.

In conclusion, based upon a review of the Report, the ODAG agrees in concept with all 15 recommendations directed to the Criminal Division, FBI, and ODAG and is in the process of evaluating and formulating measures to resolve many of the identified issues. The ODAG appreciates the professionalism exhibited by your staff in working jointly with our combined representatives to complete this evaluation and inspection.

Please feel free to contact me should you have any questions.

APPENDIX VIII: OIG ANALYSIS OF THE DEPARTMENT'S RESPONSE

The Office of the Inspector General provided a draft of this report to the Office of the Deputy Attorney General (ODAG), the Criminal Division, and the FBI for their comments. The consolidated Department response prepared by the ODAG is included in Appendix VII of this report. The OIG's analysis of the Department's response and the actions necessary to close the recommendations are discussed below.

Recommendations 1 to 15. See pages 43 and 44 for the text of the recommendations.

Status. Unresolved – open.

Summary of the Department's response. The Department agreed in concept with all of the recommendations in the report. The Department also stated that it is in the process of evaluating and formulating measures to address the recommendations, which may include considering organizational changes. The Department also stated that the final form of the organizational changes might affect how it implements the measures to achieve the most effective resolution to identified issues.

OIG Analysis. Because the Department did not provide specific responses to the recommendations, or a discussion of any specific planned corrective actions or proposed completion dates, we consider all recommendations in this report to be "unresolved." To resolve the recommendations, the Department should provide specific responses to the recommendations, including proposed corrective actions and completion dates, by January 29, 2010.