

OPERATIONAL GUIDE TO WHITE-COLLAR CRIME ENFORCEMENT

A Report of the National Center on White-Collar Crime

INVESTIGATIVE PLANNING

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ABOUT THE AUTHOR

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PLANNING THE INVESTIGATIVE PROCESS IN
WHITE-COLLAR CRIME ENFORCEMENT

I. INTRODUCTION

The world of white-collar or economic crime investigation is often considered foreign and mysterious to traditional law enforcement personnel. The language itself is a blend of "escrows", "debits", and "non-issuer" transactions, and can be intimidating. The volume of documentary evidence, not to mention the time spent in analyzing it, is overwhelming. It often appears dull, academic, and tedious. But mostly it appears too complicated. Few in the law enforcement business are familiar with the intricacies of a set of double-entry books of account; fewer of us have started and run our own business. Our salaries will not allow us to play the stock market, particularly the highly volatile over-the-counter market. We have seldom approached a banker for other than a simple auto loan or home loan. Public Administration or Police Science courses seldom require accounting, business administration, finance, banking, real estate, or economics courses. The fact is that most policemen accustomed to a caseload of traditional criminal cases are totally unequipped to deal with the sophisticated businessmen who bilk billions of dollars a year from innocent, and not always greedy, citizens under the guise of "legitimate business transactions." We are ill equipped to meet this challenge. Yet, white-collar crime is big business, and if law enforcement fails to assert itself in the area, it will continue to undermine the integrity of our free enterprise system.

Every criminal investigator has come to the day when all burglaries look alike; when the problems all look the same and the solutions, if not easy, are discouragingly predictable--in short, when the challenge has gone. White-collar crime investigations challenge the ablest and brightest investigative

minds in the law enforcement community to match wits with the most clever and devious criminal minds in the nation. The challenge is potentially the most exciting that a law enforcement career can offer. This guide is an attempt to outline some of the major differences in approach between the organization and conduct of a white-collar crime investigation and the traditional criminal case, with an emphasis on planning and organization.

In beginning a white-collar crime or fraud investigation you have to accept the fact that it is going to take a good while. Unlike the routine, or even the not-so-routine criminal case which can be resolved in a few days, most fraud cases will take weeks or even months of full-time investigative effort. A large volume of documentary evidence will be collected, processed, and analyzed, and numerous witnesses will be interviewed. Each case will involve the inner workings of one or more business structures with which you will be unfamiliar. The crime will often be ongoing even as you are investigating. The witnesses, and sometimes even the victims, will be hostile, uncooperative, and often sympathetic toward the suspect.

Everyone involved with the offense will know more about it than you will. You can not just plow ahead. You have to do homework. You have to plan your investigation so that you do not miss vital information because of your own lack of knowledge, so you do not create unnecessary legal problems, so you do not create hostile witnesses or alert your target to the fact of your investigation before you are ready. Overall, you have got to engage in an ongoing planning process in order to keep control of the case. In complex cases involving masses of evidence, you must start planning for the day when that evidence will have to be put in a usable form for presentation to a prosecutor or, more important, for presentation to a jury. It is unrealistic to expect to sit down at the end of your labors and pull together all the diverse facts, documents, and bits of

testimony into a cohesive whole. It is even more unrealistic to expect someone else, particularly a busy prosecutor, to be able to distill from the mass of information you present him in several cardboard boxes and file folders, the elements of a crime. An investigator must plan his work on various levels. Operationally, he must consider what leads to follow, the order in which they are pursued and the manner in which that pursuit takes place. In every case where numerous witnesses are to be interviewed, it is important to consider in advance the sequence of interviews, where they are to take place, and how much should be said. Serious consideration should be given to interviewing the suspect at an early stage of the proceedings, at a time when Miranda admonishments may not be necessary, and when he may be comforted enough by your apparent lack of knowledge of the facts to be lulled into a false sense of security.

In light of the fact that no interviewee is likely to keep the fact of your interview a secret, considerable thought must be given to the order in which witnesses are contacted. Careful planning in this area can serve on the one hand to minimize collaboration among witnesses and on the other hand to induce such collaboration so that a concealed relationship may be exposed or a planned but easily disproven story encouraged. Occasionally, it is beneficial to plan simultaneous interviews or simultaneous service of subpoenas or search warrants in order to inhibit collusion or destruction of evidence. These various considerations and many others must be weighed in order to proceed efficiently and effectively on a white-collar crime investigation.

II. DEVELOPING A BACKGROUND

In order for such planning to be a fruitful process, there are certain preliminary steps which should be taken. Clearly, it is difficult to plot a course of investigative action without first having some idea of your desired direction. Further, it

is dangerous to adhere to any such course of action rigidly. While planning is essential, flexibility is more essential. Alternative courses of conduct should be considered early or entertained readily as your investigation progresses. Good planning and flexibility is born of thorough preparation. It is essential before you embark on your investigative effort that you learn the rules of the game you are playing in and enough background on the players to make intelligent choices. Most cases start with an initial citizen complaint. While this complaint may set your direction, good planning requires that you learn enough background about the general subject matter of the case to make intelligent choices.

The first step in setting the direction your investigation is to follow is to learn the business structures your suspect is working within (or working over). If you are dealing with a stock fraud, you should learn the language of the market. You have to learn the dynamics of the business, not how it works in text books, but how it works in the real world. It is helpful to read books, pamphlets or articles on the market. It is often extremely beneficial to contact a working professional in the area who is reliable or well regarded in the industry and solicit his advice on the routine workings of the business. Run hypothetical fact patterns by him and solicit his analysis of why things were done the way they were done or seem to have been done.

Emphasis should be placed on determining those factors about various businesses that will help you in determining your target's motivations. What are the standards of achievement in a particular business? Where are the "ego strokes" which influence your suspect's actions? Where are the financial or career advancement benefits? What aspects of a given business will affect your witnesses' perception? In a fraud case, the facts of the case, that is the "What happened?" is seldom at issue. Your greatest challenge, invariably, is proving your suspect's intent at the time that he committed the critical acts. It is only through a solid general understanding of the world in

which the suspect lives and what motivates him and his victims, that you will be able to recognize the factual threads that will weave the circumstantial web necessary to prove intent.

All white-collar cases involve to some extent the manipulation of everyday business processes. The con man understands how transactions are normally done, he understands the "buzz words" used by professionals in a field. He understands where professionals in a particular business walk close to the legal line. More important, he understands to what degree stepping over the legal line is tolerated by people in a business for a living. It is in exploiting this knowledge that he finds his greatest success. Many a fraud investigator (and many a prosecutor) has investigated an apparent illegal act only to find that what appeared to a layman as highly questionable conduct or even blatant illegal conduct was, in fact, a commonly accepted practice employed industrywide and, thus, of limited evidentiary value. Many hours chasing noncriminal conduct can be saved by a careful, if basic, education in the standards of conduct and normally accepted procedures of a particular kind of business.

III. INTELLIGENCE

While some cases come to the attention of fraud investigators through referrals from an intelligence unit, most do not. Cynical comments are often heard that intelligence investigators spend a great deal of time collecting vast volumes of trivial or fragmented information, but such information seldom results in cases. The burden of making cases rests on all of us. It is a fact that what may be trivia when it is sitting in a drawer may be a valuable lead when put in the context of your case. It is not uncommon for a white-collar crime investigation to proceed well down the road to completion before the investigator handling the matter finds out that his own office's intelligence files contain valuable pieces of information. Nor is it uncommon for two or more agencies of government or two or more divisions of one office to be working an active case on one subject. Such

discoveries are not only embarrassing but are avoidable by a careful search of all available intelligence resources at an early state of your investigation.

IV. MAINTAINING FLEXIBILITY

While in the typical criminal case you begin your investigation with a clear idea of what the crime is, this is seldom the reality in a white-collar crime. Almost all such cases involve some species of theft. However, it is seldom productive to settle on a specific crime and aim your investigation solely toward proving the elements of that crime. There are hundreds of criminal statutes in every state criminal code which regulate business conduct. In general, these laws are seldom used and widely neglected by criminal investigators. Some laws are hidden away in the books and are only occasionally discovered by some enterprising investigator or lawyer. Keep an open mind! Concentrate your efforts on finding out what happened. Whether or not the conduct is in violation of one statute or another is a secondary consideration at the investigative stage. Wherever possible, it is helpful to contact a prosecutor at this early stage of the investigation, and solicit his assistance and, hopefully, his continued participation as the investigation progresses. He will be able to assist you by suggesting alternative investigative courses, as well as advising you on search and seizure and privacy aspects of your case.

In the final analysis, the charging of a white-collar crime case often requires a considerable degree of creativity on the part of the issuing prosecutor. Given the complexity of such cases, the fact patterns seldom fit into neat pigeon holes. As indicated previously, the critical factor in every such case is the defendant's intent at any given moment in a long series of transactions. This factor alone requires a greater degree of insight and analysis than that needed for a traditional criminal case. Concentrate on motivation: "Why did he do it when he did?"

Fraudulent schemes are seldom preplanned in detail. Most of the action was precipitated by some momentary exigency or some target of opportunity. To examine each event or transaction in context requires a greater than usual degree of thoroughness in interviewing, in report writing, and in evidence gathering.

V. DOCUMENTARY EVIDENCE

It is an adage of fraud investigation that while witnesses may "roll over," change their testimony, or forget, the documents you are able to gather will give you warmth and comfort on the coldest nights. It is critical that one analyzes at an early stage of an investigation the location and accessibility of all documents which may have evidentiary value. These documents should be obtained at the earliest possible date.

The most immediate source of documentary evidence is your victim or reporting party. Obtain from him the originals of all documents, papers, notes, memoranda, calendars, diaries, checks, contracts, etc., which he may have. Return xerox copies for his records. It is from these documents, together with the victim's statement, that you will glean the information that you use to plot the course of your entire investigation.

It is essential to obtain originals, for as the circumstances change and civil lawsuits are filed, some documents essential in original form or illegible in copy form may end up in other court proceedings or lawyer's files. Handwriting analysis may often depend on the accessibility of originals. The physical integrity of the document may be critical. Whether it was folded, stapled, dog-eared, or otherwise marked or defaced can be of vital importance. The longer an original is in the hands of non-law enforcement personnel, the greater the chance that it may be written on, lost, defaced, or destroyed. Moreover, if you do not get the original now, the prosecutor is undoubtedly going to ask you to make another trip to get it later.

As indicated previously, the documentary evidence you are able to obtain is often the most valuable, and obviously such evidence may come from many sources in addition to the victim/complainant. The sources of documentary backup for your theory of a case are many and varied, but that subject will not be covered here. From a planning point of view, however, a number of considerations are important. While as a general rule it is best to get whatever documents you need as soon as possible, there are several very specific reasons for the rush. Many types of records are only kept by the gathering agency for a very brief time, and then they are destroyed. Telephone company records fall into this category, for example. No greater frustration can be felt than to discover that vital evidence in your case was routinely destroyed the week before you got it. Some records take time to obtain because they are either time consuming for the custodian to retrieve, or they have been stored at some distant location beyond your immediate reach. Consideration should be given early in your investigation to what documentary evidence, essential to your case or at least possibly helpful, should be sought out on a priority basis.

It must also be recognized that documentary evidence is subject to quick destruction or hiding. It pays to get to this material before it gets "lost," or is burned in a fortuitous fire. Given the need for early seizure of records, it is best to plan for initial investigatory efforts to find out where the paper is and how long it is likely to be where it is.

VI. PLANNING FOR AND SEARCH AND SEIZURE

Consideration should be given to the means used to obtain documents for other reasons. A search warrant affidavit, unless it is sealed by order of the court, is public record and will often tell the world much more about the status of your investigation than you want to be made public. Most banks today, as a

matter of bank policy, inform their customers of the service of subpoenas and search warrants and, in some cases, even of the voluntary production of records. Consideration should be given in advance to obtaining an order from the court, either for bidding or relieving the bank from the responsibility of notifying their customer. One should also consider carefully what information should be put in an affidavit in support of a subpoena duces tecum or search warrant to assure maximum security.

The reverse is also true. There are cases where investigative benefits can be derived from going after bank records in the most obvious way. Often the mere fact of law enforcement interest, when brought to a suspect's attention, will induce him to take precipitous action such as cleaning out accounts, moving funds, etc. These transactions can often aid in tracing funds to other accounts or to their sources.

Depending on the laws of each particular jurisdiction, the gathering of documentary evidence will meet with differing degrees of difficulty. For example, in California where there is, effectively, no practical pre-filing subpoena power available to local investigatory agencies, the vast majority of bank records obtained in connection with fraud investigations are obtained by search warrant. A search warrant must be returned to the court within ten days of its issuance. If an investigator wishes to reconstruct an entire bank account for a year or two, the volume of copying may be very time consuming and extremely burdensome on the bank. While one should not stop short of obtaining all the records reasonably necessary to complete the investigation, one should give consideration to obtaining the documents incrementally, focusing first on the most critical time period and then broadening the area of focus as investigative needs dictate. Such a procedure not only preserves what is often a tenuous relationship with the bank but also saves valuable time, while minimizing the risk that a reviewing appellate court will find the scope of your inquiry impermissably broad within the meaning of recent right-to-privacy cases.

Just what procedure you use in obtaining records will vary according to the type of case, the type of records, and the laws of your state. The California experience with regard to the court's view of the right to privacy bears mention. It has been shown historically that the California courts have been in the vanguard of most rulings affecting civil rights. The views of the California courts tend to move east and affect the thinking of other judges throughout the nation. Despite the recent ruling by the U.S. Supreme Court in the case of U.S. v. Miller, 425 U.S. 435 (1976), which held that a depositor does not have a reasonable expectation of privacy in his bank records, the California Supreme Court in Burrows v. Superior Court, 13 Cal.3d 238 (1974), held to the contrary that a depositor did have an expectation of privacy in such records held by a bank that was not his victim. This decision was based on the California Constitution which may be construed by the court more strictly even in the face of a more liberal construction (from a law enforcement point of view) by the U.S. Supreme Court. This ruling by the California Supreme Court and several subsequent rulings led to legislative action which severely restricted the power of the state authorities to obtain documentary evidence. (See California Government Code 7460-93.)

In order to obtain records from a financial institution in California by a subpoena duces tecum, it is required that there be a declaration in support of the subpoena which states reasonable cause to believe that a crime has been committed and that the evidence sought will aid in the investigation of that crime. The requirements for a subpoena duces tecum under the new law is substantially the same as the requirements for a search warrant. Under California law, all subpoenas for financial records must be approved in advance by a judge. While this discussion is not intended to teach the law of California in this area, it is mentioned here because as in most cases where the government's

discretion has been eroded by case law or statute, the rules have arisen out of a pattern of abuse of discretion and carelessness indulged in by attorneys and investigators, albeit quite innocently. In order to keep your jurisdiction from enacting such restrictive rules and to protect your case from reversal, you should guard against the abuses which have spawned the limitations in California. In this regard several warnings are worth keeping in mind.

1. Have a reason for wanting specific documents. It is not enough to simply swoop down and scoop up all the paper in sight. It is essential in both the short and long run that you have reasons that you can articulate why you want certain papers in the context of your investigation. A corollary of this suggestion is that you be as specific as you can in the records you subpoena or search for, consistent of course with the aims of your investigation. While it is difficult to resist the temptation to seize everything in sight for fear you might miss something, a whole string of recent cases has indicated judicial displeasure with investigative overreaching, particularly as measured against the courts' desires to protect against unwarranted government "snooping". It only takes one instance of overzealous inquiry into ancillary, unrelated matters to encourage a court not only to strike down your search or seizure but to create restrictions you will have to live with forever.

2. Prepare at the earliest stages of your investigation a master affidavit laying out the factual basis for the offense you anticipate charging. This affidavit can be used over and over to form the basis for subpoenas, search warrants, court orders, and arrest warrants. A great deal of time and effort can be saved by cutting and pasting such an affidavit for various uses. You should not forget, however, to review and update the affidavit as the investigation progresses. Recent California cases have held that a search may be invalidated where information favorable to the defendant or mitigating against the issuance of the warrant was excluded from the affidavit in support of that warrant. Care

should be taken to see that the information in your affidavit is correct and complete at the time it is to be used.

VII. DOCUMENTS CONTROL

Without repeating the desirability of original documents, or at least fully legible copies, some comment should be made about documents control and preservation. The most unforgiveable sin is to lose an original document. Nearly as bad is to lose track of it. It is not uncommon to obtain two or three boxes of original business files in the course of your investigation. What do you do with these papers once you have them? Some investigators will sit down and thoroughly go through each and every document looking for those evidentiary tidbits that will help make their case. Having found those items they extract them, perhaps mark and catalog them--and then put the balance of the documents in the evidence locker, perhaps never to be viewed or reviewed again. While this process is quick and direct, it is fraught with peril for a number of reasons. As your investigation progresses, your perspective changes and things which may have been innocuous or meaningless last month may have great significance today. The documents you seize should be maintained by you in such a manner that you will have access to them on an ongoing basis. It is not unusual for a defendant during trial to accuse the government of having possession of a vital document or file which he alleges he put in those three boxes. Disproving that allegation and dispelling the aura of foul play may be difficult if the investigator is not in a position to prove what was not in those boxes, as well as what was.

You should plan at the outset of every case a document indexing or accountability system which will give you complete control over what is in your custody, what is not, and which will also give you easy access to all of the material you have gathered. Various methods are available to you. One simple system is to simply mark and number each item consecutively as it comes into your possession and to maintain a log indicating the date you obtained the evidence, the source of the evidence, the person producing it and the person who can testify as to the necessary foundational

requirement. Some experienced investigators maintain documents according to the source of the documents, listing all the evidence obtained from a specific bank, institution, or person separately.

It is helpful to establish a system of evidence carriers in your office which can be habitually used by all personnel. Some offices use large manila envelopes prepared for that purpose with printed spaces for the investigator to enter the vital information describing the circumstances of seizure, the nature of the contents and the identity of the various foundational witnesses. Once you have inventoried and logged the documents, your plan should provide for ongoing control. The integrity of the original evidence must be maintained. A system should be devised to assure that each file folder remains intact, containing no more or less than when you obtained it and retaining it in the same internal sequence. Where individual documents must be removed from a file, they should be replaced with copies annotated with the date the original item was removed, by whom and where it can be located. It is not good policy to allow the originals out of your basic evidence files for any purpose other than scientific analysis or introduction into evidence.

Basically, these different ways for handling evidence are variations on the traditional techniques used by criminal investigators throughout the nation. The nature of your case will invariably determine exactly which procedures are the best in each circumstance. It is absolutely essential, however, that some system to provide accountability and accessibility be devised at the earliest stage of your investigation. Meticulous attention to whatever system you devise from the very outset of your evidence gathering will allow you to retain the flexibility in investigative priorities so essential to white-collar cases. When you discover you have gone off in the wrong direction, it will be great comfort to be able to go back to square one and conveniently review your evidence with an eye toward new directions.

VIII. INTERVIEWING AND REPORT WRITING

Thus far, considerable attention has been given to document handling. In that these bits of paper are the life blood of a fraud investigation, the emphasis is not misplaced. However, a larger part of your effort will be expended on the street talking to witnesses. The techniques of interrogations and witness interviews are more properly a subject for broader discussion than this guide. It is not suggested that interviewing techniques are any different in white-collar cases than in any other case. However, there are some aspects of such cases which dictate that greater emphasis should be placed on some techniques.

Because white-collar cases by nature involve long investigation, an investigator will have greater flexibility in structuring the course of the investigative effort. It is often helpful to consider who should be interviewed first and who should be saved for last. It is necessary that an interview of a certain witness not be conducted in the blind. The investigator is in a position to consider using a whole series of interviews as background in helping to make one or more particularly important interviews more productive. Because the transactions being investigated are complex and the facts are voluminous and detailed, preparation for interviews is of greater importance than in a routine criminal case. As indicated previously, it is extremely helpful to plan the sequence of your interviews to assist you in your increasing knowledge not just of the evidence but of the background necessary to understand the evidence. Other considerations in planning the sequence of interviews include:

1. maintaining a degree of security concerning the identity of your target or the nature of the crime being investigated;
2. preserving the cooperation of witnesses as long as possible before they realize cooperation is not in their interest;
3. avoiding the diminishing of your appearance of omniscience by being unprepared or inexperienced; and

4. avoiding the need to admonish a witness, i.e., diminishing the possibility that your interview might become "custodial" in the legal sense.

It is often helpful to schedule your interviews in order to achieve the most positive impact. The order or timing of your interviews can often lead your target or other witnesses to a false impression as to what you are looking for or how close you are to finding it. Needless to say, this sort of deception can be a useful device to lower the guard of a reluctant witness. These and other considerations should be consciously and carefully analyzed and reevaluated throughout the investigative process. It is this planning and replanning that will move an investigation along with dispatch.

As an adjunct to witness interviews, a few words are appropriate on the subject of report writing. There are different schools of thought regarding how much detail an investigator should include in reports. One view is that a minimum of essentials should be reported, thus "saving the good stuff for trial." The better policy however, particularly in fraud cases, is to include as much detail in your report as you can recall, whether you understand the significance or not at the time of writing. Not only is this practice in keeping with the spirit of modern discovery rules, but more importantly, it is of tremendous assistance to the investigator as he analyzes and reanalyzes his case and to the prosecutor who may never know enough about the case to ask the right question to elicit the unreported information.

Every fraud investigator has had the experience of coming to a dead end; being stumped as to what he has or where to go. When you get to that point and you go back to that report you wrote six months ago at the start of your investigation, you will find that much of what you wrote then that meant little to you will have taken on an entirely new or different meaning. If you did not write it down, unless you are some incredible brand of genius,

you are not likely to be able to remember all the detail. Moreover, the prosecutor may discover during trial information that makes some well-documented and formerly meaningless trivia vital evidence in the case. Put it all down so that you can use it and so can the prosecutor. Experience in fraud trials is that the more information the defense has about your case, the less likely he is to go to trial.

IX. DATA ANALYSIS

Having gathered your documents and interviewed your witnesses, what have you got? One of the most tedious yet fascinating aspects of fraud investigation is the continuing process of analysis which is essential to melding together all the data you have gathered into a recognizable picture. While some may assign this job to an auditor or other technical personnel, no one is more able to pull a case together than the one who knows all the facts. It is an unusual individual than can do this in his head. After six months of work on a series of financial transactions, your head is so full of dates, times, amounts, and conversations that it is unrealistic to expect that you will be able to correlate all of your data and see the flow of a transaction and the motivations behind it. Thus it is essential that you analyze, schedule, diagram, plot or otherwise overlay all the information you have gathered into some sort of flowing transactional sequence. Various techniques are available to recreate these complex and distant events.

The first, easiest, and best method is to lay out your data chronologically, preferably using some sort of month-at-a-glance calendar. We all tend to think of time in terms of 30-day months, 7-day weeks, weekends, etc. A mere list of dates of events or checks, etc., is not as enlightening as plotting those events in a calendar framework. By layering the dates of letters, the dates of checks, the dates of visits and the dates of other significant events, a transactional overlay can be developed which will

provide numerous leads and numerous answers. The various analytical approaches are as varied as your imagination can conceive. The essential element is a visual crosshatching of information, enabling the investigator to compare the many variables in his case.

Spread sheets can be prepared to plot and depict cash flow, trace funds from a source to the various uses to which those funds were put, or compare receipts, deposits, and expenditures with significant events of various classes. Flow charts or time lines can not only serve to give meaning to a chain of events for the benefit of the investigator's analysis, but are quite helpful in explaining the case to prosecutors, witnesses, and ultimately to a jury.

Some highly structured techniques of visual analysis have been developed by various law enforcement agencies throughout the nation. The California Department of Justice has published two books which are illustrative of the modern emphasis on the application of business management techniques to law enforcement needs:

1. V.I.A. (Visual Investigative Analysis) is a system of developing graphic "networks" or charts to interrelationships or interdependencies of facts or activities.
2. Link Analysis Charting techniques or Link Network Diagraming is another technique for integrating and presenting complex information.

Although these systems are primarily oriented toward the graphic presentation of material, experience has shown that the process of creating such a graphic analysis is itself an invaluable analytical tool. It is essential to recognize that this sort of analysis is not something which should be reserved until the end of your investigation. This process must be an ongoing effort which will inevitably assist you in determining the entire direction of your investigative efforts.

X.. CONCLUSIONS

Ongoing planning and careful consideration to each step in the investigative process and the effect of that step on the overall goals of the investigation is the one factor that can turn an investigator from a fact gatherer into a puzzle solver. It is the puzzle-solving aspect of our calling that provides the continuing challenge that makes white-collar crime investigation the most fascinating area of modern law enforcement.

Suggested Reading

Visual Investigative Analysis: Instructional Handbook,

by William Petersen and Roy Leyrer. California
Department of Justice, Western Regional Organized
Crime Training Institute, 1771 Tribute Road, Sacra-
mento, CA 95815; January, 1977.

Investigative Report Writing, issued by Stephen Keutzer,

Chief Counsel, Special Investigation Division, Oregon
Department of Justice, State Office Building, Salem,
OR 97310; 1976.