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NATIONAL EVALUATION  
OF THE  
MAJOR WHITE COLLAR CRIME PROGRAM

VOLUME III

EVALUATION DESIGN SUPPORT DOCUMENT

June 1981

**IIIR**

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NATIONAL EVALUATION  
OF THE  
MAJOR WHITE COLLAR CRIME PROGRAM

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EVALUATION DESIGN SUPPORT DOCUMENT

Submitted to:

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## CHAPTER I. INTRODUCTION

This document is a supplement to the national evaluation of the Law Enforcement Assistance Administration's Criminal Conspiracies Major White Collar Crime Program Final Report. The national evaluation was supported by a grant from the National Institute of Justice. The primary goal of the evaluation was to identify and describe the significant factors affecting the operation and success of white collar crime projects in agencies having a major white collar crime focus.

The Evaluation Design Support Document includes details of the research design and evaluation methodology and various data collection instruments and procedures. This document was developed for the use of the criminal justice research community and criminal justice practitioners. IIR has endeavored to develop data collection instruments and techniques amenable to incorporation and institutionalization as agency reporting processes. The instruments are, therefore, not designed for single purpose or one time evaluation operations, but rather as more permanent feedback and management information devices.

In May, 1979, the National Institute for Law Enforcement and Criminal Justice (NILECJ) announced a Solicitation for preliminary proposals for an evaluation of the LEAA Criminal Conspiracies Major White Collar Crime Program. The stated purpose of the evaluation was to determine the operational impact of the program and the causes for variation in that impact. In September, 1979, NILECJ awarded the

major white collar crime program evaluation to the Institute for Intergovernmental Research (IIR). (The NILECJ subsequently was reorganized as the National Institute of Justice.)

One of the first tasks undertaken by IIR upon receipt of the evaluation award was the preparation of a detailed outline of the Solicitation and IIR's proposal to better ensure that the entire evaluation effort would be responsive to stated requirements. In addition, the major white collar crime program itself was thoroughly examined as a part of the program documentation reviews, including the historical development and evolution of the program. The indepth examination of the program substantially aided IIR's understanding of the individual projects and the "state of the art" at the time of the respective program interventions. An analysis of the Law Enforcement Assistance Administration's Major White Collar Crime Program is contained in Chapter I of the Final Report.

The ten projects funded by LEAA under the major white collar crime program which were considered as candidates for intensive evaluation are listed in Exhibit 1 in the order in which the projects were funded.

EXHIBIT 1  
LEAA CRIMINAL CONSPIRACIES MAJOR WHITE COLLAR CRIME PROJECTS

FLORIDA SECURITIES FRAUD IDENTIFICATION AND ENFORCEMENT PROJECT

Securities Fraud Section  
Office of the Comptroller  
Tallahassee, Florida

Grant	#75-DF-04-0007	\$ 99,000	Period 09/01/74 to 01/31/76
	76-DF-04-0016	600,797	02/01/76 to 07/04/78
	78-DF-AX-0110	271,086	07/05/78 to 07/04/79

PHOENIX WHITE COLLAR CRIME INTELLIGENCE PROJECT

Phoenix Organized Crime Intelligence Unit  
Phoenix Police Department  
Phoenix, Arizona

Grant	#76-DF-09-0026	\$277,706	Period 07/01/76 to 08/03/77
	77-DF-09-0028	198,200	08/04/77 to 03/03/79

MASSACHUSETTS ORGANIZED CRIME PROJECT

Office of the Attorney General  
Boston, Massachusetts

Grant	#76-DF-01-0019	\$394,795	Period 07/15/76 to 06/30/78
	78-DF-AX-0104	213,900	07/01/78 to 12/31/79

NEW JERSEY WHITE COLLAR CRIME/TOXIC WASTE PROJECT

Economic Crime Unit  
Division of Criminal Justice  
Department of Law and Public Safety  
Princeton, New Jersey

Grant	#76-DF-02-0022	\$375,000	Period 10/01/76 to 06/30/78
	78-DF-AX-0097	449,970	07/01/78 to 06/30/79
	,9-DF-AX-0078	199,995	07/01/79 to 11/18/80

TEXAS WHITE COLLAR CRIME PROJECT

Office of the Attorney General  
Austin, Texas

Grant	#77-DF-06-0002	\$211,275	Period 11/01/76 to 04/30/78
	78-DF-AX-0075	155,000	05/01/78 to 08/31/79

SAN FRANCISCO CORRUPTION CONTROL/SPECIAL PROSECUTIONS PROJECT

Office of the District Attorney  
San Francisco, California

Grant	#77-DF-09-0018	\$325,032	Period 04/15/77 to 08/14/79
	79-DF-AX-0090	293,608	07/09/79 to 01/08/81

ALABAMA SECURITIES FRAUD DETECTION, IDENTIFICATION, & ENFORCEMENT PROJECT

Alabama Securities Commission  
Montgomery, Alabama

Grant	#77-DF-04-0011	\$200,000	Period 07/01/77 to 03/31/79
	77-DF-04-0011 (S-1)	80,593	04/01/79 to 12/31/79

DELAWARE WHITE COLLAR CRIME PROJECT

Office of the Attorney General  
Wilmington, Delaware

Grant	#78-HC-AX-0011	\$350,496	Period 08/01/77 to 04/30/80
	80-CJ-AX-0044	200,000	05/01/80 to 10/31/81

MASSACHUSETTS PROCUREMENT ANTI-FRAUD PROJECT

Special Commission Concerning State and County Buildings  
Boston, Massachusetts

Grant	#79-DF-AX-0039	\$209,507	Period 03/01/79 to 06/30/80
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MARION COUNTY, INDIANA, WHITE COLLAR CRIME/ORGANIZED CRIME PROJECT

Office of the Prosecutor  
Indianapolis, Indiana

Grant	#79-DF-AX-0111	\$ 66,344	Period 08/01/79 to 04/30/80
	#80-CJ-AX-0041	\$100,000	05/01/80 to 04/30/81

## CHAPTER II. EVALUATION GOAL, OBJECTIVES, AND RESEARCH DESIGN<sup>1</sup>

The stated goal of the national evaluation of the major white collar crime program, as set forth in the Solicitation for preliminary evaluation proposals, was to identify and describe those significant factors affecting the operation and success of agencies having a major white collar crime focus.

The purpose of the IIR evaluation was to conduct both a process and impact evaluation of the five major white collar crime projects which were selected for intensive evaluation by the National Institute of Justice after consultation with the LEAA program managers. In keeping with the requirements of the Solicitation, this national evaluation was focused more upon the process aspects of the projects.

IIR's evaluation philosophy is that evaluation research can be a valuable source of information for federal program managers seeking to introduce innovation into operational environments, and for state and local criminal justice professionals seeking to improve the way their agencies operate.

Two underlying purposes of the evaluation were envisioned by IIR: to evaluate the technical aspects of a program, and to provide potential criminal justice users with information to support the adoption of similar programs in their jurisdictions and/or to enhance program effectiveness once the programs were adopted.

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<sup>1</sup> Much of the material in this chapter is contained in Chapter II of the Final Report.

Methodologically, six activities were planned and carried out in the IIR evaluation effort, as follows:

- o Conduct a process evaluation of each project that focuses upon the issues of priority setting and strategy development.
- o Conduct a process evaluation of the collection, analysis, and use of intelligence information and analyze the impact of intelligence information on the investigative and prosecutive processes of each project.
- o Describe the strengths and limitations of the legal authorities of the participating agencies and analyze their respective impacts upon each project's investigative and prosecutorial processes.
- o Describe the relationship between the participating criminal justice agencies and regulatory agencies and analyze the impact of these relationships upon the ability of the project to carry out its mission.
- o Identify other factors which have a significant impact upon the operations of each project.
- o Review the cost effectiveness of the projects in terms of the arrest and conviction of white collar crime offenders.

The program suggested in the Solicitation was fundamentally designed to support the creation of major white collar crime enforcement capabilities. This program focus is significant in terms of establishing the "starting points" of projects funded under the program.

While the LEAA Major White Collar Crime Program represented an important criminal justice initiative and a pioneer federal level effort, a number of state and local agencies were already in the process of responding to major white collar crimes at the time federal funding efforts commenced. Further, a significant number of other state and local agencies had already established impressive records of performance in organized crime enforcement, including the penetration of equally complex conspiracies, and the prosecution and conviction of

important organized crime figures. Many, if not most, of these other efforts had also been supported by LEAA discretionary funds and/or state block grants.

The IIR evaluation research design incorporated both the organizational and programmatic diversities existing at the project level, as well as the diversities in project environments within which the program's intervention occurred.

The six evaluation activities mentioned above were designed to answer the following research questions. These research questions were developed following extensive interviews with project personnel during initial site visits, interviews with LEAA program monitors, examination of program documentation, and examination of documents at all ten white collar crime projects:

- o How did pre-existing environmental conditions influence project implementation and effectiveness?
- o How do the identified types of white collar crime influence project implementation and effectiveness?
- o How does legal authority influence project implementation and effectiveness?
- o How does resource availability influence project implementation and effectiveness?
- o How does an overall enforcement strategy influence project implementation and effectiveness?
- o How do prioritizations of enforcement effort influence project implementation and effectiveness?
- o How does planning for specific investigations and prosecutions influence project implementation and effectiveness?
- o How do cooperative, multijurisdictional working arrangements between criminal justice and regulatory agencies influence project implementation and effectiveness?

- o How does the application of intelligence techniques and intelligence/offense information influence project implementation and effectiveness?
- o Cost effectiveness: What dollar costs can be associated with project impacts in terms of the arrest and conviction of offenders?

These ten research questions were specifically designed to incorporate the objectives of the evaluation. In addition, they also provided a framework for the evaluation effort which would recognize the program's operational characteristics as well as the problems common to implementation in each project. Sufficient flexibility was incorporated in the research questions to accommodate the diversities of the individual projects without adversely affecting either the conduct of the national evaluation, or the quality of research findings. IIR attempted to collect the most productive and relevant information possible given the inherent constraints of a summative evaluation; it is felt that the information collected meets the credibility requirements of the evaluation audience.<sup>2</sup>

The research questions, as related to the findings of the evaluation, are addressed in two chapters of the Final Report. Those research questions that lent themselves to narrative descriptions of the various project activities are set out in Chapter III, entitled: Reports on the Projects Selected for Intensive Evaluation. Those research questions which could be addressed in terms of statistical data manipulations are also found in Chapter III and in Chapter IV, entitled: Interjurisdictional Comparisons. The evaluation experience

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<sup>2</sup>Fitz-Gibbon, Carol Taylor and Lynn Lyons Morris. How to Design a Program Evaluation. Sage Publications, Beverly Hills, California, 1978, pp. 13-14.

indicated that a further refinement of some of the ten research questions should be recommended; these are discussed below.

IIR found that the specificity of the Solicitation and the evaluator's response were somewhat restrictive when applied to the individual projects. For example, the evaluation clearly evidenced that the application of intelligence techniques did not exist as a separately identifiable activity at project sites as had been presupposed; rather, the intelligence capabilities were integrated into the project investigative and prosecutive processes.

Further, the Solicitation's stated emphasis on intelligence processes was determined to be more applicable to organized crime enforcement projects, particularly those having a decade or more of operational experience. The intelligence information utilized by the major white collar crime projects was of a tactical nature and the processes used were quite rudimentary in comparison to those common to organized crime intelligence activities. For the most part, and reflecting the state of the art, existing law enforcement intelligence data bases were found to be of minimal value in white collar crime enforcement; therefore, projects were required to develop new and distinct intelligence data bases which addressed frauds and other illegal schemes, and which identified the perpetrators of those schemes. Compounding the problem was the lack of criminal justice experience with the kinds of illegal activities involved, the sophistication of the activities (in that most were specifically constructed to avoid detection), the need for documentary evidence, the use of criminal and civil statutes and regulations seldom involved in traditional enforcement, and the lack of prior criminal records of the vast majority of perpetrators.

There were identified uses of more sophisticated intelligence data bases, including organized crime data, in specific cases or activities (e.g., arson, toxic waste, extortion). Generally, however, projects developed their own intelligence information from the comparative wealth of complaints and files possessed by regulatory agencies and, to a lesser extent, existing complaints and files of criminal justice agencies. Much of the intelligence data possessed by the projects were directly attributable to the investigative efforts of the projects themselves and to the expertise and knowledge of project staffs.

In addition, initial conceptions of the distinctiveness of enforcement strategies, priorities, and planning should be refined based upon examination of site processes. Due to the relatively small size of project staffs (generally less than 10), strategies, plans, and priorities were not necessarily evidenced in a formal way. Overall strategies were to a considerable degree determined by the enforcement thrust of the sponsoring agency and enhanced by the sponsor's assignment of authority and responsibility to the project.

Priorities were found to be important considerations in each of the projects. Priorities were also found to be affected, over time, by the project's internal development of expertise and information. This resulted in a continuous upgrading of project enforcement thrusts to address more complex illegal activities and activities which met constantly rising standards of importance and appropriateness.

Planning also was evidenced, although project staffs gained sufficient experience over time to relax the need for formal planning to guide the investigative efforts in every case. Even in the most

closely knit and experienced staffs, however, some degree of planning was found to be integral to case activities. For instance, investigative requirements were set out by supervisory personnel on an "exception" basis with the more routine investigative avenues being presumed. However, in the more complex cases and particularly cases of first impression, detailed formal planning did occur in all of the projects. Further, in all of the projects, prosecutive or legal staff involvement with investigative staffs was evidenced to a high degree throughout case development. Once investigations reached the stage in which prosecution was determined to be appropriate, formal planning did occur, including the transmittal of specific investigative and evidence requirements to investigative staffs. The degree of prosecutive (or legal) directed planning was found to be a fairly uniform practice in both the regulatory and criminal justice projects.

### CHAPTER III. EVALUATION METHODOLOGY<sup>3</sup>

Because of the magnitude and complexity of major white collar crime cases, only a comparatively small number can be handled effectively by a single agency, particularly if compared to normal investigative workloads. This is also true of the number of case dispositions in that a relatively small number of major white collar crime cases culminated in adjudication during the evaluation period of fifteen to eighteen months, due primarily to the length of time typically required for the investigation and prosecution of these cases.

In addition, there has been an historical lack of acceptable data upon which project performance can be measured. In commenting upon this problem at the federal level, a Congressional subcommittee observed:

There is no single, centralized compilation of white collar crime statistics similar to the statistics on street crime compiled by the FBI in its annual Uniform Crime Reports. Such statistics as are available are generally located in relatively inaccessible reports of the various regulatory agencies (e.g., the annual reports of the Internal Revenue Service or Securities and Exchange Commission). The report of the American Bar Association's Committee on Economic Offenses concludes that the federal government lacks both the necessary mechanisms to measure accurately its own efforts against white collar crime and to assess the impact of such offenses on the country as a whole. This report further concludes that the federal government has collected little data in this crime area, and the data which have been gathered are of "questionable validity" because there are "no uniform standards for collecting economic crime data as among the relevant agencies."

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<sup>3</sup>Some of the material in this chapter is contained in Chapter II of the Final Report.



In a footnote to their observation, the subcommittee commented as follows:

The Uniform Crime Reports do include arrest data on forgery, embezzlement, and fraud but the most accurate data reported, in terms of reflecting the true incidences of crime, are "crimes known to the police" which only include the seven "indexed crimes" of murder, rape, assault, robbery, larceny-theft, burglary, and motor vehicle theft.<sup>4</sup>

The relatively small number of cases (only sixty at one site) which had been handled by the five projects (in comparison to other caseload activities of the sponsoring agencies), the extraordinary length of time between detection and adjudication (again, when compared with other typical case activities of the sponsoring agencies), the aforementioned lack of acceptable historical data, and the uniqueness and consequent lack of representativeness of the individual sites, all tended to preclude sophisticated statistical analyses of data for the purposes of assessing either cross-sectional or longitudinal impacts. Consequently, the evaluation research questions concerning both process and impact were assessed primarily through reviews of program related documents and interviews with key personnel. Certain interjurisdictional comparisons were made, however, using simple but appropriate statistical techniques. Each of these techniques is discussed in the ensuing sections.<sup>5</sup>

<sup>4</sup> Subcommittee on Crime of the Committee on the Judiciary, House of Representatives. White Collar Crime: The Problem and the Federal Response. 95th Congress, 2nd Session, June 1978, pp. 12-13.

<sup>5</sup> This type of research design may be characterized as an ex-post-facto study or analysis. See Harris K. Goldstein. Research Standards and Methods For Social Workers. Whitehall Company, Wheeling, Illinois, 1969 Revised Edition, pp. 76-77. Or see John Van Maanen. The Process of Program Evaluation: A Guide For Managers. National Training & Development Service Press, Washington, D.C., 1973, p. 58.

The projects in the ten sites initially reviewed for purposes of site selection were influenced by at least seven important factors:

- o Economic crime enforcement, particularly major white collar crime enforcement, was in a fairly early stage of development, with public and private recognition of the seriousness of these crimes having only emerged during the last decade. Thus, numerous voids existed (and still exist) in terms of a well defined body of literature, relevant experimentation and research, enforcement experience, and data upon which performance and success could be fairly assessed.
- o Project enforcement capabilities and focus were in a continuous, evolutionary state during the evaluation, and inextricably tied to the project's own experiences and the general state-of-the-art of white collar crime and criminal conspiracies enforcement.
- o While the program identified a broad enforcement purpose and major operational characteristics, specificity in their implementation was relegated to the individual projects.
- o The program accommodated variations in project environments which influenced project creation and development; e.g., the lack of uniform organizational and authority settings, and the potential existence of important, diversified socio-political influences in project settings.
- o The timing of the program's initial intervention and duration and, to a lesser extent, the amount of program financial support varied considerably among the individual projects.
- o The development of an investigation and prosecution focus on major white collar crimes presented new and unique challenges to state and local enforcement agencies requiring, inter alia, strategies and planning; cooperative multiagency considerations; and policies, operations, and resources not required in traditional law enforcement efforts.
- o Program implementation varied considerably among the sites due to the divergent organizational settings, structures, and authorities existing at the state and local levels of government.

Four specific, interrelated inhibitors to major white collar crime enforcement were cited in the Solicitation. These inhibitors involved a lack of the following:

- o Specialized skills, knowledge, and resources
- o Specific investigative focus: priorities, strategies, and plans
- o Appropriate legal authorities possessed by a single agency
- o Cooperation between regulatory, investigative, and prosecutive agencies and jurisdictions

In response to these interrelated inhibitors, four anticipated operational characteristics were ascribed to the capabilities resulting from program implementation and were generally found to exist at program locations. These operational characteristics are as follows:

- o The expansion of single agency authority and coordination of effort through cooperative multijurisdictional relationships with other criminal justice, civil, or regulatory authorities
- o The development of appropriate enforcement strategies, with established priorities and plans for particular investigative and prosecutive efforts
- o The development of necessary skills and other resources for utilization in particular investigative and prosecutive efforts
- o The conduct of specific enforcement activities resulting in the arrest and conviction of major white collar crime offenders

#### A. SOURCES OF DATA

The general categories of information listed in Exhibit 2 (page 30) were collected from various sources at each site. The first six categories were used as independent variables, while the others were

the dependent variables shown in the research questions discussed in the previous chapter. The case files were the primary source of data for the dependent variables. Most of the sources listed produced data for the independent variables, although there was some overlap.

Exhibit 3 (page 31) lists the influences on project implementation and effectiveness by stage of occurrence, pre-award of federal grant funds, post-award, or both. The Solicitation requested a determination of cost effectiveness in terms of arrests and convictions; each of the influences listed in Exhibit 3, of course, played a role in establishing a project's overall effectiveness and efficiency. However, the measurement of cost effectiveness was found amenable to expansion by the inclusion of civil penalties to the criminal penalties, resulting in the following listing:

#### COST EFFECTIVENESS

- o Number of arrests
- o Number of criminal convictions
  - Length of sentences
  - Amount of fines
- o Number of civil actions
- o Number of civil penalties
  - Number of administrative sanctions
  - Revocations/suspensions of licenses and permits
  - Amount of fines/restitutions
  - Amount of voluntary restitution

The evaluation team conducted reviews and examined documents and reports pertaining to project development and operational activities. These methods of data collection are explored further in the remainder of this chapter. In addition to project documentation and reports specifically relating to LEAA funding, other available written information was also reviewed. Included within the scope of these other reviews were project investigation and prosecution logs, case files,

intelligence information files (as appropriate), special reports, assessments, and administrative documentation.

Investigative case files consisted usually of a case jacket, a case opening memorandum, and other case memoranda. Among the other contents of case files were arrest reports, surveillance reports, results of inquiries on subject individuals, organizations, vehicles and locations, arrest and search warrants, and case disposition information.

In addition, examination of correspondence relevant to project development was conducted, including multijurisdictional relationships/ working arrangements, staff acquisition and training programs, annual reports, legal opinions, and such other documentation which directly related to project implementation and effectiveness.

The evaluation team conducted on-site interviews with key project personnel and representatives from external agencies participating in project activities. By reason of the legal, organizational, and operational diversities of the individual projects, interviews were appropriately tailored to each project.

Interviews were conducted with project managers, supervisors, investigative and prosecutive/legal staff members, and administrative personnel as deemed appropriate. In addition, participating agency personnel were also interviewed where applicable. These interviews primarily focused upon representative personnel of agencies with whom the projects had a formal and continuous working relationship; for instance, prosecutive personnel who worked regularly with a project sponsored by a regulatory agency or personnel assigned to the project on a permanent basis.

To a lesser extent, representative personnel of other agencies with whom the project may have had less formal relationships were also interviewed. Some of these interviews included representatives of agencies who provided criminal offense information to a project, or who provided resources upon request, or agencies involved in project operational strategies to better ensure coordination of overall enforcement efforts. Included in this latter category of interviews were personnel of investigative or law enforcement agencies providing information or investigative resources, regulatory and licensing authorities, and other agencies possessing civil or criminal jurisdiction which overlapped or which could overlap into project enforcement areas, thus requiring mutually acceptable coordination mechanisms and/or agreements.

It was not found to be necessary to interview as many non-project respondents as originally planned. For example, there was a general misconception that one or more of the projects operated under joint management. This was not found to be the case in any project. Thus, interviews within the sole sponsoring agency were often found to be acceptable where the single agency was fully responsible for management of all project cases and no external agency personnel were regularly involved. Interviews with external agencies were conducted if issues surfaced regarding the effectiveness of interagency working relationships.

Exhibits 4 (page 32), 5 (page 33), and 6 (page 34) list information to be collected prior to site visits, on site tasks of evaluation team personnel, and documentary information to be obtained at each site.

## B. SITE SELECTION

The data collection process took place over a thirteen month period and involved two rounds of site visits. The first round, in late 1979 and early 1980, involved visits to all ten white collar crime projects which were the candidates for intensive evaluation. Based upon these initial site visits, an IIR report entitled Site Assessment Summaries<sup>6</sup> was prepared and submitted to the National Institute of Justice and LEAA. Exhibit 7 (page 35) is an outline of the contents of the Site Assessment Summaries report.

Five of the initial ten sites were selected for intensive evaluation based on the results contained in the Site Assessment Summaries report. The background and implementation information contained in the report resulted in preliminary findings which provided the necessary framework for the Institute's selection of the five sites. The second round of site visits took place during the second half of 1980.

A total of eighteen visits were made to the ten sites, with 143 staff days being spent on site trips. IIR staff spent an average of three times as many days at the five intensive study sites than at the other five sites.

The report was prepared in draft form for the purposes of site selection and was subsequently furnished to each of the sites for review and comment. All ten of the sites responded either orally or in writing. These responses were reviewed and the draft report was

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<sup>6</sup>Reed, William L., Emory B. Williams, E. Bruce Buckley, Robert G. Bowers, and Andrea G. Lange. Preliminary Major White Collar Crime Program Site Assessment Summaries. Institute for Intergovernmental Research, Tallahassee, Florida, 1980.

revised as appropriate with revisions incorporated ultimately into the final evaluation report. The reviews by individual sites were proven to be extremely valuable in ensuring the accuracy of reported sequences of events, influences in project development, and discrete processes utilized in the initiation, investigation, and prosecution of project cases.

The Site Assessment Summaries report was intended to be a comprehensive, descriptive assessment designed to maximize the information available for site selection decision making. Certain selection factors were not utilized; e.g., because of the small number of sites, geographic balance and governmental levels could not be determining factors. Also, data availability proved to be a uniform problem area at most sites and could not be used as a major determinant in selecting the final sites. Some of the sites were eliminated because of their uniqueness. For example, the Massachusetts Special Commission Concerning State and County Buildings, which did not significantly refer cases for prosecution until the close of the project, and the Texas Attorney General's White Collar Crime Unit, which dealt primarily with civil violations, were eliminated.

The five sites that were selected represented both regulatory and criminal justice sponsoring agencies. New Jersey's project was located in an agency with a strong record of achievement and performance with regard to other programs. Delaware's project experienced serious initial difficulties but was successfully reorganized under a newly elected official. The Massachusetts project was located in a criminal justice agency with authority typical of similar agencies in many other states. Alabama's project was located in a regulatory

agency which handled a broad white collar fraud caseload, while the Florida project addressed a comparatively narrow white collar fraud problem of considerable local importance.

### C. METHOD OF DATA COLLECTION

A set of data collection instruments was developed to guide evaluation team interviews of key project personnel to elicit responses to the ten research questions posed in the Design.

In preparing these instruments, the evaluation team first prepared a lengthy list of over 100 questions pertaining to the ten research questions. Next, the team listed likely key staff positions in each of the projects to develop an array of potential interviewees. This list was then refined to ensure uniformity of interviewees among all sites selected for intensive evaluation. The initial set of interview questions was then refined and further consolidated for simplicity and clarity. Following this process, the team reviewed each of the questions and noted the logical interviewees for each. At least two interviewees were deemed necessary for a response to each question in order to improve reliability of the information gathered.

Following this listing, the potential interviewee list was reviewed to ensure that appropriate project personnel (in terms of authority, duties, etc.) were being selected and that both policy and line levels of personnel would be interviewed.

Finally, the team tested the approach by selecting certain sites, identifying key staff members, and selecting the appropriate questions for each individual in terms of project position, authority, and duties. In addition, the numbers of questions per individual were

reviewed to ensure that no single position or staff member would be overburdened unnecessarily in the course of the site interviews.

On site, appropriate questions were assembled and packaged for interviews of key personnel. This flexibility allowed for the tailoring of the interview format to the particular organization and staffing which existed at each site. The interviews of key personnel together with the other data collection instruments also allowed for the maximum collection of cross-site data and information even though the projects were very diverse. This interview guide, based on the ten research questions, is shown in Exhibit 8 (page 36). Exhibit 9 (page 43) displays the categories of respondents appropriate for each of the interview guide questions.

Three other data collection instruments were designed to capture variables such as funding information, organizational information, administrative data, and case activities for each grant period of the individual projects. The three separate instruments are as follows:

WCC Project Grant Summary, which focused upon the project's staffing and funding sources (Exhibit 10, page 47).

WCC Project Overview, which collected important information relating to the project's legal authority, jurisdiction (geographic), organizational structure, screening processes, and criminal prosecution of cases (Exhibit 11, page 50).

WCC Project Case Activity Counts, which collected case activity information. This instrument specifically addressed data collection needs relating to sources of project investigations, case openings and closures, and case disposition and adjudicative data (Exhibit 12, page 53).

The broad diversity among the sites identified in the descriptions of project operational characteristics, jurisdiction, and authority contained in the Site Assessment Summaries was also found to exist in the reporting practices of the individual projects, and to some extent variances were found to exist in case documentation practices and content within the sites.

A case information worksheet (Exhibit 13, page 57) was developed to capture individual case data at each of the sites. To ensure the reliability and validity of the case information collection device and the other collection instruments, emphasis was given in the construction of the instruments to field tests, analysis, revisions, and training of evaluation staff in their use. One evaluation team member supervised all data collection activities on and off site.

The case information worksheet was designed to collect quantitative data at several points in the white collar crime case processing. Exhibit 14 (page 61) indicates the data collection points and the related case processing stages.

When more than one member of the evaluation data collection team were filling out the case worksheets, the data collectors were physically located together. Thus, any interpretation decisions were immediately rendered and communicated. The IIR data collection supervisor reviewed each of the completed instruments on site for uniformity and clarity.

After the review of data sources the required information was entered on the instrument. Usually, one data source was exhausted and then another data source was used to complete information requirements. Site agency identification numbers were marked on data sheets

to assure consistency between data sources. Any discrepancies between and among data sources were brought to the attention of site agency personnel and rectified.

Limited interpretation of source data was sometimes necessary. In each instance, a policy decision was made and data collectors were informed (for example, that suspended sentences were to be categorized as probation). Where data interpretation was consistently necessary, the data collection instrument was generally revised to aid the interpretation decision.

Although some of the sites were in various stages of developing automated management information systems, none of the sites had an automated case information system which could be used in the collection of case data. Thus, all collections of case data were conducted manually.

As available, project technical case data were supplemented by other sources such as complaint logs, arrest logs, court disposition and sentencing records, agency management records, grant management documentation, and by descriptive data such as interviews with key investigative, prosecutive, and management personnel. Exhibit 15 (page 62) displays the primary interview groups and the number of interviewees. Although most of the data utilized were self-reported by project agencies, these existing aggregated data bases were maintained for internal management purposes, and not developed for purposes of this evaluation.

Agency staff at each site were extremely cooperative and helpful in directing data collectors to data, but were not involved in completing the primary data collection instruments. Each of the data

gatherers had relevant background and experience in the subject area of the project. The data gatherers were also experienced and educated in the fields of law enforcement and/or prosecution. Thus, their interpretations were made on an informed and uniform basis.

Some of the data at one site were not used for purposes of the computer analysis. In Delaware, two separate blocks of "backlogged cases" were not included in the processed data. These "cases," dealing with unemployment fraud and welfare fraud, were considered to involve insufficient work volume per case when compared to the cases of other projects and to other Delaware project cases to warrant full "case" status. They were treated, therefore, in summary fashion as a group.

The technical case data collection device was a check-list type instrument that charted the legal and judicial steps through which each case proceeded. The technical data obtained covered the following eight variables, four of which have been further broken down into two categories for each case: "individuals" and "organizations."

For each case:

- o method by which complaints were received
- o source of referral
- o time elapsed between the case opening and disposal
- o method of closure

For individuals and organizations:

- o charging action taken
- o charges filed
- o dispositions
- o penalties

If a particular case involved more than one individual or organization, or multiple disposition actions, each was noted. Thus, the total number of individuals and organizations involved exceeds the total number of cases, and the total number of disposition actions (such as convictions) exceeds the number of cases in which they occurred.

One aspect of the technical case data collection procedure was not found to exist as presupposed. The data regarding time between case opening and case disposal was not uniformly available at each site. IIR would recommend that subsequent evaluation efforts and internal management information systems be revised to specify that dates be recorded when project cases are formally opened, completed, submitted for prosecutive review, submitted for prosecution, and closed. In addition, IIR recommends that probation and suspended sentence data be collected as separate categories. Exhibit 13 (page 57), the Project Caseload Data Collection Form, has been revised to reflect these findings.

#### D. METHOD OF DATA ANALYSIS

Descriptive, narrative information was analyzed to focus upon the differences between planned and actual project operations. Where available, base line data and pre-project measures were utilized in this analysis. The evaluator made a conscious decision to examine every white collar crime case file in each of the projects to maximize the collection of a rich and potentially productive base of technical information and quantitative data.

Data provided by the technical data collection instrument described above were tabulated into categories for each variable and

cross tabulated for each variable by each site. Frequency counts and percentages of cases (and where appropriate of individuals and organizations) were computed. Using these statistics, three kinds of analyses were made:

- o Comparisons among categories of each variable within a site
- o Comparisons among categories of each variable across sites (site by site comparison)
- o Comparisons of the frequency and proportion of total cases studied that were dealt with at various stages in the legal and judicial process across sites (interjurisdictional comparisons)

These analyses show the relationships among project inputs, activities, and results, and between project descriptive data and technical data. Where necessary, alternative explanations of results were considered, along with rival causes and possible external influences.

What occurred at each site was considered unique and unlikely to be repeated at another place or another time. This led to the decision that the various sites could not be considered samples from a particular population or universe. Thus, no tests of statistical significance have been made of differences found. Instead, in the interests of conservatism, only major differences were reported and commented on. In addition, the collection of data in all 1,068 project cases is also considered to add to the reliability and validity of conclusions.

The information obtained by the above methods provided a basis for determining the relative effect of activities at each site on cases, individuals, and organizations. This in turn led to judgments of relative effectiveness determined by relating the effects found by

the foregoing methods to the data obtained by case studies of each site on the following independent variables:

- o pre-existing environmental conditions
- o types of white collar crime
- o legal authority
- o resources available
- o overall enforcement strategy
- o priorities of the enforcement agency
- o planning and carrying out investigations and prosecutions
- o cooperation with other criminal justice and regulatory agencies
- o application of intelligence techniques
- o costs in terms of arrests and convictions

The data on these latter variables are primarily qualitative rather than quantitative. Study of effectiveness is, therefore, based on a content analysis rather than statistical analysis of these topics. In carrying out this content analysis, operationally defined terms and the careful training of data interpreters is considered to increase the reliability and validity of conclusions. Exhibit 16 (page 63) displays the Final Report Outline and locates where each of the research questions is addressed.

In all tables contained in the Final Report, data in some of the cases were of unknown origin or derived from "other" sources, or source information was missing. Percentages shown are of cases for which data was available. On some of the variables, unknown or "other" ranged from five per cent to twenty-two per cent of the total



data. In addition, table totals sometimes add to less or more than 100 per cent due to the rounding off of percentages to whole numbers.

EXHIBIT 2  
TYPES OF INFORMATION COLLECTED

	<u>Qualitative</u>	<u>Quantitative</u>
Project host agency jurisdiction and authority	X	
Project structure	X	
Project case screening procedures	X	
Prosecution procedures	X	
Grant and budget data		X
Personnel information		X
Case referrals		X
Case activity, including closings		X
Case status information		X
Case dispositions		X
Criminal and civil penalties or sanctions		X

EXHIBIT 3  
INFLUENCES ON PROJECT IMPLEMENTATION  
AND EFFECTIVENESS

Influences	Pre-grant award	Post-grant award
1. Pre-existing environmental conditions		
a. Initial assessment of white collar crime problem	X	
b. Sponsoring agency strengths & limitations	X	
c. Public/private support	X	
d. Organizational & administrative preparation & planning	X	X
2. Targeted crimes areas	X	X
3. Legal authority		
a. Sponsoring agency	X	
b. Project's delegated authority		X
c. Extensions of authority		X
4. Availability of resources		
a. Sponsoring agency	X	
b. Project		X
5. Overall enforcement strategy goals/objectives/missions	X	X
6. Prioritizations of effort		
a. Case selection		X
b. Resource allocations		X
7. Investigative/prosecutive/planning		X
8. Multijurisdictional arrangements - interdisciplinary/intergovernmental		X
9. Utilization of intelligence processes & products		X

EXHIBIT 4  
INFORMATION TO BE COLLECTED PRIOR TO SITE VISIT

- o Available project grant information and other documentation
- o Introductory letters as appropriate
- o List of persons to interview
- o Addresses/directions/maps
- o Identification or clearance established
- o Necessary copies of interview data collection instruments
- o Demographics of project coverage area

EXHIBIT 5  
ON SITE TASKS

- o Conduct interviews with command personnel, project director, chief investigator, chief prosecutor, other operational personnel, administrative personnel.
- o Interview relevant personnel from participating, non-sponsor agencies.
- o Utilize appropriate interview format guidelines.
- o Gather data utilizing project grant summary data collection instrument, project overview instrument, and project case activity count instrument.
- o Meet at least daily to assess interview and data collection status.
- o Re-interview or conduct additional interviews as necessary.
- o Check data collection instruments for completeness and accuracy.
- o Arrange to copy desired on-site material for off-site review.
- o Meet with project representatives to handle follow-up matters and subsequent activities.
- o Prepare site visit documentation.

EXHIBIT 6  
DOCUMENTARY INFORMATION TO OBTAIN AT SITE (AS NECESSARY AND RELEVANT)

- o Contact persons' names, titles, addresses, and telephone numbers
- o Agency annual reports and other publications
- o Organizational charts
- o Grant applications
- o Grant progress reports and final reports
- o Agency budget documents
- o Case processing charts
- o Interagency agreements
- o Case reporting instructions/guidelines
- o Legislation
- o Relevant memos and other documentation
- o Local evaluations of project
- o Legislative reports or studies
- o Project manuals and reports
- o Relevant press releases and newspaper reports
- o Grant correspondence
- o Training program/seminar attendee lists
- o Minutes of board/other meetings

EXHIBIT 7  
SITE ASSESSMENT SUMMARIES REPORT OUTLINE

1. Grant Overview

- o Dollar amounts, dates
- o Agencies involved
- o Project titles
- o Awards, continuations

2. Project Initiation and Background

- o Area demography
- o Events/issues influencing initiation
- o Assessment of need
- o Sponsoring agency authority, focus, organization, and resources
- o Existing levels of cooperation
- o Planned extensions of cooperative efforts
- o Project impediments/resolutions to impediments

3. Project Objectives and Implementation

- o Goals and objectives
- o Placement within sponsor's organization
- o Organization of the project
- o Staff selection and training
- o Investigative policies and procedures
- o Prosecutive/litigative policies and procedures

4. Project Case Management

- o Origin of cases
- o Screening, selection, and assignment
- o Case strategy development
- o Case referrals

5. Project Outcomes

- o Criminal actions
- o Civil/administrative actions
- o Other accomplishments

6. Institutionalization

EXHIBIT 8  
INTERVIEW GUIDE -  
AREAS OF INQUIRY BASED ON RESEARCH QUESTIONS

I. HOW DID PRE-EXISTING ENVIRONMENTAL CONDITIONS INFLUENCE PROJECT IMPLEMENTATION AND EFFECTIVENESS?

1. When did agency first recognize the existence of a significant white collar crime problem(s) within its jurisdiction?

- What were these white collar crime problem(s)?
- How were they identified?

2. At the time of the initial identification of the white collar crime problem(s), what was the size of the agency's budget and the source of funding?

- How many prosecutors (attorneys)?
- How many investigators?
- How many investigative accountants?

3. What is the current agency budget, sources of funds, and staffing in the following areas?

- Prosecutors (attorneys)?
- Investigators?
- Accountants?

4. Did the agency establish and fund an enforcement effort prior to the receipt of grant funds?

- Was an existing or a new organizational unit established?
- Where was unit located or placed?
- What was staffing level?
- What kinds of staff assigned?
- Any new staff hired?
- What was the stated mission of the prior unit?
- Were specific goals or objectives formulated?
- What activities were assigned to the prior unit?
- Were both criminal and civil remedies pursued by the prior unit?
- What were the predominant charging actions and/or sanctions used by the prior unit?
- Were any other organizational, staffing, or resource needs identified after the prior unit became operational?
- Were these needs met by the prior unit and who determined this?
- Were new training needs identified and met by the prior unit?
- Who provided training?

EXHIBIT 8 - Continued

5. Did the new effort have an effect or change agency working relationships with other agencies?
  - Had the agency been involved in the development or creation of other multi-agency efforts or programs?
  - Had the agency been involved as a participant in other multi-agency efforts?
  - Did your agency perceive any significant benefits from these prior multi-agency efforts?
6. Were there any important influences on unit development which originated outside the agency?
7. Were there any particular individuals within the agency who influenced the establishment of the initial effort?
8. Was the legal authority and jurisdiction of the unit deemed sufficient?
9. When was the decision to seek federal funding for WCC effort made?
  - Who was involved in this decision?
  - Were resource needs the only basis for the decision?
10. Were other agencies involved in the planning for the proposed project?
  - Was it anticipated at the time the project was planned that other agencies would assign prosecutive or investigative personnel to the project (identify)?
  - Were other agencies expected to provide resources, other than permanent personnel, to the project (identify)?

II. HOW DO THE IDENTIFIED TYPES OF WHITE COLLAR CRIME INFLUENCE PROJECT IMPLEMENTATION AND EFFECTIVENESS?

1. Had the agency's assessment of WCC problems changed from any initial assessments? If so, how?
2. Did the project's stated goals and/or objectives reflect a revised assessment from the original white collar crime assessments of the agency?
  - Were any differences a result of emphasis?
  - Were any differences the result of workloads?
  - Did these objectives address any new areas of enforcement interest?
  - What effect, if any, did the identified WCC criminals or criminal activities have on project operational and organizational development?

EXHIBIT 8 - Continued

3. Did the initial enforcement focus inhibit or enhance project development?
4. What effect did initial enforcement successes or failures have on subsequent project development?
5. What new funding or staffing requirements were identified in the project?
6. Did the project address new or additional needs in terms of:
  - policies and procedures?
  - training?
  - authority and jurisdiction?
7. Did the project involve changes in agency management and supervision of the project?
8. Did the organizational status or placement of the project differ from prior unit or effort?
  - Did the physical location differ from that of the parent agency?

III. HOW DOES LEGAL AUTHORITY INFLUENCE PROJECT IMPLEMENTATION AND EFFECTIVENESS?

1. What legal authority was delegated to the project (civil/criminal/regulatory)?
2. What enforcement functions were assigned to the project (detection/investigative/prosecutive)?
3. What additional authorities were identified as necessary to accomplish assigned missions?
4. Were there any limits placed on the delegation of authority to the project?
5. Were complementary authorities obtained from outside the project?
  - From the sponsoring agency?
  - From external agencies?
6. Were any identified authority needs not met but subsequently obtained?
7. Did any authority needs remain unsatisfied?

EXHIBIT 8 - Continued

8. What was the geographic jurisdiction of the project?

- Was the geographic jurisdiction extended through cooperative extensions?
- Were geographical extensions through other agencies a routine occurrence in the project case activities?
- Were any geographic constraints not overcome?

IV. HOW DOES RESOURCE AVAILABILITY INFLUENCE PROJECT IMPLEMENTATION AND EFFECTIVENESS?

1. What characteristics of WCC case activities affect project staffing requirements (complexity, length, documentary, evidence, financial knowledge)?

2. Did the project identify technical skills and other expertise deemed requisite to WCC enforcement capabilities?

- Did existing agency staff possess necessary skills and expertise required?
- Were agency staff members possessing such skills assigned to the project?
- Were grant funds used to acquire additional staff skills and expertise?
- Were (non-grant) agency funds used to acquire additional staff skills and expertise?
- Did any staffing needs remain unsatisfied based upon original assessments?

3. Did staffing needs change over time?

- Were subsequently identified staffing needs addressed? If so, how?
- Were other than full-time personnel utilized to address staffing needs?
- What other resource needs were identified as requisite to effective WCC enforcement?

4. Were project needs different from those addressed in other areas of agency enforcement efforts?

5. How were the additional needs of the project met?

- Grant?
- Agency?
- External agencies/cooperation?

V. HOW DOES AN OVERALL ENFORCEMENT STRATEGY INFLUENCE PROJECT IMPLEMENTATION AND EFFECTIVENESS?

1. Does the overall enforcement strategy of the project emphasize major white collar crimes?

EXHIBIT 8 - Continued

2. What criteria were used to define major white collar crimes?

- Have these changed over time?
- Did the project emphasis on major white collar crimes differ from agency's emphasis in other enforcement areas? If so, how?
- Did the agency continue any other white collar crime efforts other than those of the project?

3. Did the establishment of a major white collar crime focus result in a change in the kinds of agencies with whom a working relationship was maintained?

VI. HOW DO PRIORITIZATIONS OF ENFORCEMENT EFFORT INFLUENCE PROJECT IMPLEMENTATION AND EFFECTIVENESS?

1. Who initially decides whether an investigative matter will be assigned for project review?

- Who determines the initial level of effort to be expended?
- Who initially reviews the results of this effort?

2. Who decides whether to proceed with a full investigation or to terminate?

- What are the criteria for this decision?
- Are these written criteria?

3. Who monitors and determines whether an investigation continues?

- What is the frequency of investigative monitoring?

4. Who has the authority to adjust caseloads and assignments?

5. Who has the authority to adjust priorities among assigned cases?

- What criteria are used in making such adjustments?

6. Who has the authority to reassign project cases:

- for continuation by units other than the project?
- for continuation by other agencies?

VII. HOW DOES PLANNING FOR SPECIFIC INVESTIGATIONS AND PROSECUTIONS INFLUENCE PROJECT IMPLEMENTATION AND EFFECTIVENESS?

1. Who participates in the investigative planning process?

- Who participates in the prosecutive planning process?

EXHIBIT 8 - Continued

2. Are there general guides governing investigative and/or prosecutive plans?
  - If so, are they in writing?
3. Are investigative and/or prosecutive plans prepared for each case?
  - If so, are they in writing?
4. Who monitors project activities in accordance with formulated plans?
5. What requirements or needs are addressed in investigative and/or prosecutive plans?
  - staff assignment?
  - task scheduling and assignment?
  - resource allocations?
  - additional internal supports?
  - external agency supports?
  - decision points?

VIII. HOW DO COOPERATIVE, MULTIJURISDICTIONAL WORKING ARRANGEMENTS BETWEEN CRIMINAL JUSTICE AND REGULATORY AGENCIES INFLUENCE PROJECT IMPLEMENTATION AND EFFECTIVENESS?

1. What primary project enforcement needs are met through multi-agency working agreements?
  - What criminal justice agencies are used to address these needs?
  - Frequency?
2. What regulatory agencies are used to address these needs?
  - Frequency?
3. What other public or private agencies or organizations are used to address these needs?
4. What formal mechanisms exist to facilitate multi-agency working arrangements (advisory or policy boards, task forces, written agreements)?
  - Which type of mechanism has proven most beneficial?
5. Which external agencies have been the most helpful?
  - Were these agencies involved on a regular basis?

EXHIBIT 8 - Continued

IX. HOW DOES THE APPLICATION OF INTELLIGENCE TECHNIQUES AND INTELLIGENCE/OFFENSE INFORMATION INFLUENCE PROJECT IMPLEMENTATION AND EFFECTIVENESS?

1. Does the project maintain a base of WCC intelligence information physically separate from project or agency case files?
  - What major categories (or indices) of information are contained in this base?
  - How is the intelligence base utilized and by whom?
2. What are the major sources of intelligence information used by the project other than its own files:
  - internal/agency?
  - external?
3. Is another unit or authority of the agency other than the project responsible for maintaining intelligence files?
4. What are the primary uses of intelligence information by the project?

X. COST EFFECTIVENESS: WHAT DOLLAR COSTS CAN BE ASSOCIATED WITH PROJECT IMPACTS IN TERMS OF THE ARREST AND CONVICTION OF OFFENDERS?

1. Do you consider the WCC project to have been (or to be) an effective use of resources?
  - Do you believe that the project has been a more effective use of resources than prior WCC enforcement efforts of the agency?
  - Dollar for dollar, how would you compare the project's effectiveness to that of other enforcement activities of the agency?
2. Have the costs of operating the project, or any portion of the project been assumed by the agency?
  - Was the agency's assumption of project costs authorized by a specific legislative act?
  - Were additional funds obtained as a result of a direct appropriation?
  - As a result of existing funds?

EXHIBIT 9  
 POTENTIAL KEY STAFF INTERVIEWEES  
 SITE: \_\_\_\_\_

RESEARCH QUESTION	ITEM	RESPONDENT						
		AGENCY DIRECTOR	AGENCY SUPERVISOR	OTHER ADMIN. OFFICER	PROJECT DIRECTOR	CHIEF INVESTIGATOR	CHIEF PROSECUTOR	OTHER INVESTIGATOR
I	1	X	X	X	X			
I	2		X	X	X			
I	3		X	X	X			
I	4	X	X	X				
I	5	X	X		X	X	X	
I	6	X	X		X	X	X	
I	7	X	X		X	X	X	
I	8	X	X		X	X	X	
I	9	X	X	X	X			
I	10	X	X	X	X			
II	1	X	X		X	X	X	
II	2	X	X		X	X	X	
II	3	X	X		X	X	X	
II	4	X	X		X	X	X	
II	5			X	X	X	X	
II	6	X	X	X	X	X	X	
II	7	X	X	X	X	X	X	



EXHIBIT 9 - Continued  
 POTENTIAL KEY STAFF INTERVIEWEES  
 SITE: \_\_\_\_\_

RESEARCH QUESTION	ITEM	RESPONDENT							
		AGENCY DIRECTOR	AGENCY SUPERVISOR	OTHER ADMIN. OFFICER	PROJECT DIRECTOR	CHIEF INVESTIGATOR	CHIEF PROSECUTOR	OTHER INVESTIGATOR	OTHER PROSECUTOR
II	8	X	X	X	X				
III	1	X	X		X		X		
III	2	X	X		X	X	X		
III	3	X	X		X	X	X		
III	4	X	X		X	X	X		
III	5	X	X		X	X	X		
III	6	X	X		X	X	X		
III	7	X	X		X	X	X		
III	8	X	X		X				
IV	1	X			X	X	X		
IV	2	X	X	X	X	X	X	X	X
IV	3	X		X	X	X	X		
IV	4	X	X		X	X	X	X	X
IV	5	X		X	X	X	X		
V	1	X			X	X	X		

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EXHIBIT 9 - Continued  
 POTENTIAL KEY STAFF INTERVIEWEES  
 SITE: \_\_\_\_\_

RESEARCH QUESTION	ITEM	RESPONDENT							
		AGENCY DIRECTOR	AGENCY SUPERVISOR	OTHER ADMIN. OFFICER	PROJECT DIRECTOR	CHIEF INVESTIGATOR	CHIEF PROSECUTOR	OTHER INVESTIGATOR	OTHER PROSECUTOR
V	2	X	X		X	X	X		
V	3	X	X		X	X	X	X	X
VI	1	X	X		X	X	X		
VI	2		X		X	X	X	X	X
VI	3		X		X	X	X	X	X
VI	4		X		X	X	X	X	X
VI	5		X		X	X	X	X	X
VI	6	X	X		X	X	X		
VII	1		X		X	X	X	X	X
VII	2		X		X	X	X	X	X
VII	3		X		X	X	X	X	X
VII	4		X		X	X	X		
VII	5		X		X	X	X		
VIII	1	X	X		X	X	X		
VIII	2	X	X		X	X	X		

EXHIBIT 9 - Continued  
 POTENTIAL KEY STAFF INTERVIEWEES  
 SITE: \_\_\_\_\_

RESEARCH QUESTION	ITEM	RESPONDENT							
		AGENCY DIRECTOR	AGENCY SUPERVISOR	OTHER ADMIN. OFFICER	PROJECT DIRECTOR	CHIEF INVESTIGATOR	CHIEF PROSECUTOR	OTHER INVESTIGATOR	OTHER PROSECUTOR
VIII	3	X	X		X	X	X	X	
VIII	4	X	X		X	X	X		
VIII	5	X	X		X	X	X	X	X
IX	1		X	X	X	X	X		
IX	2		X		X	X	X	X	
IX	3		X		X	X	X	X	
IX	4		X		X	X	X	X	X
X	1	X	X		X	X	X		
X	2	X	X	X	X		X		

EXHIBIT 10  
WCC PROJECT GRANT SUMMARY

Project Designation: \_\_\_\_\_

I. When was unit established?     /    /      
MO/YR

II. Grant period being reported:     /    /     to     /    /      
MO/YR MO/YR

III. What grant monies were received by the unit during the reported grant period?

A. Source: \_\_\_\_\_ Grant #: \_\_\_\_\_  
Amount: \_\_\_\_\_ Duration:     /    /     to     /    /      
MO/YR MO/YR

B. Source: \_\_\_\_\_ Grant #: \_\_\_\_\_  
Amount: \_\_\_\_\_ Duration:     /    /     to     /    /      
MO/YR MO/YR

C. Source: \_\_\_\_\_ Grant #: \_\_\_\_\_  
Amount: \_\_\_\_\_ Duration:     /    /     to     /    /      
MO/YR MO/YR

IV. Budget: What was the unit's operating budget for this grant period?

LEAA WCC program grants \$ \_\_\_\_\_  
State block grant funds \$ \_\_\_\_\_  
State appropriations \$ \_\_\_\_\_  
Other funding sources \$ \_\_\_\_\_  
Total operating budget \$ \_\_\_\_\_

EXHIBIT 10 - Continued

V. Personnel:

A. How many of each of the following categories of personnel were assigned unit responsibilities as of December 31 of this year?

	From within parent agency	Grant funded	On loan from another agency	Grant funded
Attorneys	_____	_____	_____	_____
Investigators	_____	_____	_____	_____
Investigators- accountants	_____	_____	_____	_____
Secretaries	_____	_____	_____	_____
Other (specify)	_____	_____	_____	_____

B. Describe the nature of any staff loan relationships:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

C. How many of each of the following were available on an as needed (but not full-time dedicated) basis, from within the parent agency or on loan from another agency?

	From within parent agency	On loan from another agency
Attorneys	_____	_____
Investigators	_____	_____
Investigator- accountants	_____	_____
Secretaries	_____	_____
Other (specify)	_____	_____

EXHIBIT 10 - Continued

D. Indicate the nature of any staff loan relationships:

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E. Describe any significant changes in numbers of staff, not reflected above:

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EXHIBIT 11  
WCC PROJECT OVERVIEW

Unit Designation: \_\_\_\_\_

I. Grantee

A. Name of grantee (parent) agency \_\_\_\_\_

B. Nature of grantee's authority (check one or more):

- 1. civil \_\_\_\_\_
- 2. regulatory \_\_\_\_\_
- 3. criminal justice \_\_\_\_\_

C. Grantee's geographic jurisdiction (check one):

- 1. statewide \_\_\_\_\_
- 2. regional (judicial districts; multi-county) \_\_\_\_\_
- 3. county \_\_\_\_\_
- 4. city \_\_\_\_\_

D. Grantee's highest ranking official:

- 1. Title \_\_\_\_\_
- 2. Name \_\_\_\_\_
- 3. Elective \_\_\_\_ (or) Appointive \_\_\_\_

II. Project/unit structure:

A. Title of official to whom WCC unit reports \_\_\_\_\_

B. Title of senior project official \_\_\_\_\_

1. Is senior project official an:

- a. Attorney \_\_\_\_\_
- b. Investigator \_\_\_\_\_
- c. Other (specify) \_\_\_\_\_

EXHIBIT 11 - Continued

III. Project/unit procedure

A. Which employees are responsible for case screening?

- 1. title only \_\_\_\_\_
- 2. title only \_\_\_\_\_
- 3. title only \_\_\_\_\_
- 4. other (specify) \_\_\_\_\_

B. Is case screening a formal procedure?

No \_\_\_\_\_ Yes \_\_\_\_\_

1. If yes, what criteria are used in case screening? (check one or more)

- a. Offense category \_\_\_\_\_
- b. Major fraud (number of victims, monetary loss) \_\_\_\_\_
- c. Conspiracy character (and organized scheme, offenders) \_\_\_\_\_
- d. Scope of scheme (local/multi-county/statewide/interstate/national/international) \_\_\_\_\_
- e. Potential victims/losses/levels \_\_\_\_\_
- f. Existence of relevant/appropriate authority \_\_\_\_\_
- g. Estimated resource requirements \_\_\_\_\_
- h. Available resources:
  - internal \_\_\_\_\_
  - external (cooperative agencies) \_\_\_\_\_
- i. Potential for successful action
  - recovery, fines, restitution \_\_\_\_\_
  - arrest/prosecution/conviction/incarceration \_\_\_\_\_
- j. Potential deterrent effect \_\_\_\_\_
- k. Conforms to target criteria \_\_\_\_\_

EXHIBIT 11 - Continued

- l. Potential for recurrence \_\_\_\_\_
- m. Industry-wide nature/volume of similar, related frauds \_\_\_\_\_
- n. External directive \_\_\_\_\_
- o. Other (specify) \_\_\_\_\_
- p. All of the above \_\_\_\_\_

C. Who reviews case screening decisions?

Title \_\_\_\_\_

IV. Prosecution

A. On the average, what percentage of cases were prosecuted:

- 1. Within the unit \_\_\_\_\_
- 2. By local prosecutors \_\_\_\_\_
- 3. By others ( \_\_\_\_\_ ) \_\_\_\_\_

B. What percentage of prosecutions were handled within the unit:

- 1. During the first grant period? \_\_\_\_\_
- 2. During the second grant period? \_\_\_\_\_

C. Of those cases prosecuted outside the unit, in what percentage does the unit assist the prosecution? \_\_\_\_\_

D. If prosecution is handled outside the unit and grantee, identify types of prosecuting agencies.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

E. In what percentage of the cases are the following used?

- 1. Grand jury \_\_\_\_\_
- 2. Information \_\_\_\_\_
- 3. Other ( \_\_\_\_\_ ) \_\_\_\_\_

EXHIBIT 12  
WCC PROJECT CASE ACTIVITY COUNTS

Unit Designation: \_\_\_\_\_

I. Investigative matters (complaints) received/reviewed:

- A. by telephone \_\_\_\_\_
- B. by letter \_\_\_\_\_
- C. in person \_\_\_\_\_
- D. unit initiated \_\_\_\_\_
- E. total \_\_\_\_\_

II. Source of referrals by frequency:

- A. private individuals \_\_\_\_\_
- B. private organizations \_\_\_\_\_
- C. consumer agencies \_\_\_\_\_
- D. regulatory agencies \_\_\_\_\_
- E. criminal justice/law enforcement agencies \_\_\_\_\_
- F. other executive agencies \_\_\_\_\_
- G. state legislature \_\_\_\_\_
- H. other \_\_\_\_\_

III. Investigations begun for which a case file was established during this quarter. \_\_\_\_\_

IV. Active investigations

- A. As of the end of this quarter, how many investigations were in the "active" file? \_\_\_\_\_
- B. Investigations actively pursued during this quarter (e.g., file indicates activity or other records show number of active investigations). \_\_\_\_\_

EXHIBIT 12 - Continued

V. Cases closed during this quarter by:

- A. referral to other agency/office \_\_\_\_\_
- B. official administrative dismissal \_\_\_\_\_
- C. indictment \_\_\_\_\_
- D. formal accusation \_\_\_\_\_
- E. arrest only \_\_\_\_\_
- F. other administrative action/sanction \_\_\_\_\_
- G. other ( \_\_\_\_\_ ) \_\_\_\_\_
- H. total \_\_\_\_\_

VI. How many individuals and business or other organizational entities were:

	Individuals	Organizational entities
A. indicted?	_____	_____
B. formally accused?	_____	_____
C. otherwise arrested?	_____	_____
D. total	_____	_____

VII. During this quarter, how many cases:

	Individuals	Organizational entities
A. are currently pending disposition?	_____	_____
B. were formally dropped by prosecutor?	_____	_____
C. were dismissed prior to trial?	_____	_____

EXHIBIT 12 - Continued

- D. resulted in guilty plea to original felony charge? \_\_\_\_\_
- E. resulted in guilty plea to a lesser felony charge? \_\_\_\_\_
- F. resulted in conviction on all counts? \_\_\_\_\_
- G. resulted in conviction on some counts? \_\_\_\_\_
- H. resulted in acquittal on all counts? \_\_\_\_\_

VIII. List the number of individuals and organizational entities that received (during this quarter):

	Individuals	Organizational entities
A. misdemeanor charge(s)	_____	_____
B. felony charge(s)	_____	_____
C. injunctions	_____	_____
D. orders to cease and desist	_____	_____
E. license suspension	_____	_____
F. license revocations	_____	_____
G. fines	_____	_____
H. other (_____)	_____	_____

IX. List the number of individuals or organizational entities that received (during this quarter):

	Individuals	Organizational entities
A. jail sentences	_____	_____
B. restitution orders	_____	_____
C. probation	_____	_____

EXHIBIT 12 - Continued

X. During this quarter, what was the total dollar value of:

- A. voluntary restitution? \_\_\_\_\_
- B. court-ordered restitution? \_\_\_\_\_
- C. fines? \_\_\_\_\_

XI. During this quarter, how many cases were prosecuted:

- A. within the unit? \_\_\_\_\_
- B. by local prosecutors? \_\_\_\_\_
- C. by others (\_\_\_\_\_)? \_\_\_\_\_

XII. Of those cases prosecuted outside the unit, in how many cases did the unit assist the prosecution, during this quarter?  
\_\_\_\_\_

XIII. At the time of peak assignment during this quarter, how many of each of the following categories of personnel were assigned unit responsibilities?

	From within parent agency	Grant funded	On loan from another agency	Grant funded
Attorneys	_____	_____	_____	_____
Investigators	_____	_____	_____	_____
Investigators-accountants	_____	_____	_____	_____
Secretaries	_____	_____	_____	_____
Other (specify)	_____	_____	_____	_____



EXHIBIT 13  
PROJECT CASELOAD DATA COLLECTION FORM

PROJECT SITE (CODE): \_\_\_\_\_

PROJECT CASE NAME/TITLE: \_\_\_\_\_  
(delete after data collection)

I. Source of project case referral (check one source):

- \_\_\_\_\_ A. private individual
- \_\_\_\_\_ B. private organization
- \_\_\_\_\_ C. consumer agency
- \_\_\_\_\_ D. regulatory agency
- \_\_\_\_\_ E. criminal justice/law enforcement agency
- \_\_\_\_\_ F. other executive agency
- \_\_\_\_\_ G. state legislature
- \_\_\_\_\_ H. other (list): \_\_\_\_\_

II. Case/complaint receipt method (check one source):

- \_\_\_\_\_ A. telephone
- \_\_\_\_\_ B. letter or written form
- \_\_\_\_\_ C. in person
- \_\_\_\_\_ D. project initiated (space for comment): \_\_\_\_\_
- \_\_\_\_\_ E. other (list): \_\_\_\_\_

III. Date case opened by project:

\_\_\_\_\_ day \_\_\_\_\_ month \_\_\_\_\_ year  
/\_\_\_/\_\_\_/ \_\_\_/\_\_\_/ \_\_\_/\_\_\_/

IV. Date case completed by project:

\_\_\_\_\_ day \_\_\_\_\_ month \_\_\_\_\_ year  
/\_\_\_/\_\_\_/ \_\_\_/\_\_\_/ \_\_\_/\_\_\_/

V. Date case submitted for prosecutive review:

\_\_\_\_\_ day \_\_\_\_\_ month \_\_\_\_\_ year  
/\_\_\_/\_\_\_/ \_\_\_/\_\_\_/ \_\_\_/\_\_\_/

VI. Date case submitted for prosecution:

\_\_\_\_\_ day \_\_\_\_\_ month \_\_\_\_\_ year  
/\_\_\_/\_\_\_/ \_\_\_/\_\_\_/ \_\_\_/\_\_\_/

EXHIBIT 13 - Continued

VII. Date case closed by project:

\_\_\_\_\_ day \_\_\_\_\_ month \_\_\_\_\_ year  
/\_\_\_/\_\_\_/ \_\_\_/\_\_\_/ \_\_\_/\_\_\_/

VIII. Initial charging action (list numbers of individuals and organizations):

- \_\_\_\_\_ indictment:
  - \_\_\_\_\_ A. number of individuals
  - \_\_\_\_\_ B. number of organizations
- \_\_\_\_\_ formal accusation or information:
  - \_\_\_\_\_ C. number of individuals
  - \_\_\_\_\_ D. number of organizations
- \_\_\_\_\_ otherwise arrested:
  - \_\_\_\_\_ E. number of individuals
  - \_\_\_\_\_ F. number of organizations

IX. Project/sponsoring agency assistance to prosecution/civil penalty or sanction (list numbers of individuals and organizations):

- \_\_\_\_\_ prosecuted within project/sponsoring agency:
  - \_\_\_\_\_ A. number of individuals
  - \_\_\_\_\_ B. number of organizations
- \_\_\_\_\_ civil penalty or sanction within project/sponsoring agency:
  - \_\_\_\_\_ C. number of individuals
  - \_\_\_\_\_ D. number of organizations
- \_\_\_\_\_ prosecuted outside sponsoring agency (list prosecutor):
  - \_\_\_\_\_ E. number of individuals
  - \_\_\_\_\_ F. number of organizations
- \_\_\_\_\_ did project assist outside prosecutor (check one):
  - \_\_\_\_\_ yes
  - \_\_\_\_\_ no

X. Criminal charging action (list numbers of individuals and organizations):

- \_\_\_\_\_ charged with misdemeanors:
  - \_\_\_\_\_ A. number of individuals
  - \_\_\_\_\_ B. number of organizations
- \_\_\_\_\_ charged with felonies:
  - \_\_\_\_\_ C. number of individuals
  - \_\_\_\_\_ D. number of organizations

XI. Criminal disposition action (list numbers of individuals and organizations):

- \_\_\_\_\_ charges dropped by prosecutor:
  - \_\_\_\_\_ A. number of individuals
  - \_\_\_\_\_ B. number of organizations
- \_\_\_\_\_ dismissed prior to trial:
  - \_\_\_\_\_ C. number of individuals
  - \_\_\_\_\_ D. number of organizations

EXHIBIT 13 - Continued

- \_\_\_\_\_ guilty plea/nolo contendere to original charge:
- \_\_\_\_\_ E. number of individuals
- \_\_\_\_\_ F. number of organizations
- \_\_\_\_\_ guilty plea/nolo contendere to lesser charge:
- \_\_\_\_\_ G. number of individuals
- \_\_\_\_\_ H. number of organizations
- \_\_\_\_\_ conviction on all counts (no plea):
- \_\_\_\_\_ I. number of individuals
- \_\_\_\_\_ J. number of organizations
- \_\_\_\_\_ conviction on some counts (no plea):
- \_\_\_\_\_ K. number of individuals
- \_\_\_\_\_ L. number of organizations
- \_\_\_\_\_ acquittal on all counts:
- \_\_\_\_\_ M. number of individuals
- \_\_\_\_\_ N. number of organizations

XII. Criminal case sentences (list number of individuals and organizations):

- \_\_\_\_\_ A. number of individuals sentenced to incarceration
- \_\_\_\_\_ B. total number of months sentenced
- \_\_\_\_\_ C. number of individuals sentenced to probation
- \_\_\_\_\_ D. total number of months of probation
- \_\_\_\_\_ E. number of individuals receiving suspended sentence
- \_\_\_\_\_ F. total number of months of suspended sentence

XIII. Cases resulting in fines (list number of individuals and organizations):

- \_\_\_\_\_ number ordered to pay fines:
- \_\_\_\_\_ A. number of individuals
- \_\_\_\_\_ B. number of organizations
- \_\_\_\_\_ total amount of fines:
- \_\_\_\_\_ C. total dollars for individuals
- \_\_\_\_\_ D. total dollars for organizations

XIV. Cases resulting in restitution (list number of individuals and organizations):

- \_\_\_\_\_ number ordered by court to pay restitution:
- \_\_\_\_\_ A. number of individuals
- \_\_\_\_\_ B. number of organizations
- \_\_\_\_\_ number making voluntary restitution:
- \_\_\_\_\_ C. number of individuals
- \_\_\_\_\_ D. number of organizations
- \_\_\_\_\_ total amount of restitution:
- \_\_\_\_\_ E. total dollars for individuals
- \_\_\_\_\_ F. total dollars for organizations

XV. Cases resulting in civil penalties or sanctions (list number of individuals and organizations):

- \_\_\_\_\_ injunctions:
- \_\_\_\_\_ A. number of individuals
- \_\_\_\_\_ B. number of organizations

EXHIBIT 13 - Continued

- \_\_\_\_\_ orders to cease and desist
- \_\_\_\_\_ C. number of individuals
- \_\_\_\_\_ D. number of organizations
- \_\_\_\_\_ license suspension
- \_\_\_\_\_ E. number of individuals
- \_\_\_\_\_ F. number of organizations
- \_\_\_\_\_ license revocation
- \_\_\_\_\_ G. number of individuals
- \_\_\_\_\_ H. number of organizations
- \_\_\_\_\_ consent agreement
- \_\_\_\_\_ I. number of individuals
- \_\_\_\_\_ J. number of organizations
- \_\_\_\_\_ other (list): \_\_\_\_\_
- \_\_\_\_\_ K. number of individuals
- \_\_\_\_\_ L. number of organizations

XVI. Date of final disposition:

\_\_\_\_\_ day      month      year  
/ / / /    / / / /    / / / /



EXHIBIT 15  
PRIMARY INTERVIEW GROUPS/INTERVIEWS

PRIMARY INTERVIEW GROUPS	NUMBER INTERVIEWED
Agency Director	5
Agency Supervisor	10
Other Administrative Officer	4
Project Director	10
Chief Investigator	10
Chief Prosecutor	7
Other Investigator	17
Other Prosecutor	8
Other	5

EXHIBIT 16  
FINAL REPORT OUTLINE/RESEARCH QUESTIONS

Final Report Outline (Case Study)	RESEARCH QUESTIONS									
	Pre-Existing environmental conditions	White collar crime types	Legal authority	Resources available	Overall enforcement strategy	Enforcement priorities	Investigative and prosecutive planning	Cooperation with other agencies	Application of intelligence techniques	Arrest/conviction cost effectiveness
1. Project Initiation and Background										
Pre-existing conditions	X	X								
Legal authority			X							
Institutionalization										X
2. Grant Overview				X						
3. Project Goals and Objectives										
Goals					X	X	X	X	X	X
Objectives					X	X	X	X	X	X
4. Project Organization, Structure, and Staffing			X	X	X	X		X	X	
5. Project Operations										
Case types		X								
Case origins		X						X		
Case receipt methods					X		X			
Case screening and selection priorities/assignment		X		X	X	X	X	X	X	
Case investigation and management				X	X	X	X	X		
Case activity analysis					X	X	X	X		X
6. Project Case Dispositions/Outcomes										
Criminal charging actions					X	X		X		X
Criminal disposition actions					X	X		X		X
Criminal case sentences					X	X				X
Civil penalties or sanctions										X
Voluntary restitution										X
Other outcomes			X	X			X	X	X	X

EXHIBIT 16  
FINAL REPORT OUTLINE/RESEARCH QUESTIONS

Final Report Outline (Case Study)	RESEARCH QUESTIONS										
	Pre-Existing environmental conditions	White collar crime types	Legal authority	Resources available	Overall enforcement strategy	Enforcement priorities	Investigative and prosecutive planning	Cooperation with other agencies	Application of intelligence techniques	Arrest/conviction	cost effectiveness
1. Project Initiation and Background											
Pre-existing conditions	X	X									
Legal authority			X								
Institutionalization											X
2. Grant Overview				X							
3. Project Goals and Objectives											
Goals					X	X	X	X	X	X	X
Objectives					X	X	X	X	X	X	X
4. Project Organization, Structure, and Staffing			X	X	X	X		X	X		
5. Project Operations											
Case types		X									
Case origins		X						X			
Case receipt methods					X		X				
Case screening and selection priorities/assignment		X		X	X	X	X	X	X		
Case investigation and management				X	X	X	X	X	X		
Case activity analysis					X	X	X	X			X
6. Project Case Dispositions/Outcomes											
Criminal charging actions					X	X		X			X
Criminal disposition actions					X	X		X			X
Criminal case sentences					X	X					X
Civil penalties or sanctions											X
Voluntary restitution											X
Other outcomes			X	X			X	X	X	X	X

REFERENCES

- Becker, Jay J. The Investigation of Computer Crime. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., April 1980.
- Bequai, August. White Collar Crime: A 20th Century Crisis. Lexington, Massachusetts, Lexington Books, D.C. Heath and Company, 1978.
- Blakey, G. Robert, Ronald Goldstock and Charles H. Rogoven. Rackets Bureaus: Investigation and Prosecution of Organized Crime. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., March 1978.
- Chamber of Commerce of the United States. A Handbook on White Collar Crime - Everyone's Problem, Everyone's Loss. Washington, D.C., 1974.
- Chelimsky, Eleanor and Judith H. Dahmann. National Evaluation of the Career Criminal Program: Final Report. The MITRE Corporation, McLean, Virginia, 1979.
- Clinord, Marshall B. Illegal Corporate Behavior. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., October 1979.
- Comptroller General of the United States. Resources Devoted by the Department of Justice to Combat White-Collar Crime and Public Corruption. Washington, D.C., March 1979.
- Condon, Richard. Managing an Investigation into Public Corruption. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., June 1979.
- Edelhertz, Herbert. The Investigation of White Collar Crime: A Manual for Law Enforcement Agencies. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., April 1977.
- Fitz-Gibbon, Carol Taylor and Lynn Lyons Morris. How to Design a Program Evaluation. Sage Publications, Beverly Hills, California, 1978.
- Fitz-Gibbon, Carol Taylor and Lynn Lyons Morris. How to Deal With Goals and Objectives. Sage Publications, Beverly Hills, California, 1978.
- Fitz-Gibbon, Carol Taylor and Lynn Lyons Morris. How to Measure Achievement. Sage Publications, Beverly Hills, California, 1978.
- Fitz-Gibbon, Carol Taylor and Lynn Lyons Morris. How to Present an Evaluation Report. Sage Publications, Beverly Hills, California, 1978.
- Fitz-Gibbon, Carol Taylor and Lynn Lyons Morris. How to Measure Program Implementation. Sage Publications, Beverly Hills, California, 1978.
- Fitz-Gibbon, Carol Taylor and Lynn Lyons Morris. Evaluator's Handbook. Sage Publications, Beverly Hills, California, 1978.
- Finn, Peter and Alan R. Hoffman. Prosecution of Economic Crime. Office of Technology Transfer, National Institute of Law Enforcement and Criminal Justice, Law Enforcement Assistance Administration, Washington, D.C., March 1976.
- Florida Research Center, Inc. Evaluation of the Securities Fraud Identification and Enforcement Unit: Final Report. Florida Research Center, Inc., Tallahassee, Florida, 1979.
- Franco, Edward J., Ph.D. Anatomy of a Scam: A Case Study of a Planned Bankruptcy by Organized Crime. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., November 1973.
- Gardiner, John. Corruption in Land Use and Building Regulation. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., September 1979.
- Getzels, Judith. An Analysis of Zoning Reforms: Minimizing the Incentive for Corruption. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., September 1979.
- Gibson, Larry. Report to the Attorney General of the National Economic Crime Project. U.S. Department of Justice, Washington, D.C., December 1978.
- Godfrey, E. Drexel, Jr., Ph.D. and Don R. Harris, Ph.D. Basic Elements of Intelligence. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., November 1971.
- Goldstein, Harris K. Research Standards and Methods for Social Workers. Whitehall Company, Wheeling, Illinois, 1969 Revised Edition.
- Gregg, James. Assistant Adm., OPM. Decision Memorandum to Implement the Enforcement Division's Major White Collar Crime Program.
- Hagen, Roger E. The Intelligence Process in White Collar Crime Investigation: An Operational Guide to White Collar Crime Enforcement. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., September 1979.

Karchmer, Clifford. Compendium of Operational and Planning Guides to White Collar Crime Enforcement. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., August 1979.

Karchmer, Clifford. Model Curriculum and Trainer's Guide for Programs to Combat White-Collar Crime. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., June 1980.

Lange, Andrea G. Fraud and Abuse in Government Benefit Programs. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., November 1979.

\_\_\_\_\_. Law Enforcement Assistance Administration. Computer Crime. Criminal Justice Resource Manual, U.S. Department of Justice, Washington, D.C., 1979.

Lewis, Ralph G. "Implementation Evaluation: A Future Direction in Project Evaluation." Journal of Criminal Justice. Vol. 6., pp. 167-176, Pergamon Press, 1978.

Long, Joseph C. Expanding Enforcement Options: The Securities Fraud Approach. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., June 1979.

Lyman, Theodore R. Prevention, Detection and Correction of Corruption in Local Government. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., November 1978.

May, Edgar. "White Collar Crime: Arrest by Appointment." Police Magazine. Vol. 3, No. 2, pp. 27-30, 32-35, March 1980.

McGillis, Daniel. Major Offense Bureau. Bronx County District Attorney's Office, New York, U.S. Department of Justice, Law Enforcement Assistance Administration, February 1977.

Moore, John E. and James A. Sanderson and Clark E. Mears. The Use of State Regulatory Action Against Criminal Infiltration of Legitimate Business. Department of Justice Criminal Justice Special Investigation Division, October 1975.

Muftic, Felicia. Handling of Complaints and Referrals. Battelle Institute, Seattle, Washington, September 1978.

\_\_\_\_\_. National Association of Attorneys General. Powers, Duties and Operations of State Attorneys General. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., October, 1977.

\_\_\_\_\_. National Association of Attorneys General. Prosecuting Organized Crime. Summaries of Speeches to 1974 NAAG Seminars, 1974.

Nossen, Richard A. Determination of Undisclosed Financial Interest. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., June 1979.

Nossen, Richard A. The Seventh Basic Investigative Technique. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C.

\_\_\_\_\_. Office of the Attorney General. National Priorities for the Investigation and Prosecution of White Collar Crime. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., August 1980.

O'Neill, Robert. Investigative Planning. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., June 1979.

Reed, William L., Emory B. Williams, E. Bruce Buckley, Robert G. Bowers, and Andrea G. Lange. Preliminary Major White Collar Crime Program Site Assessment Summaries. Institute for Intergovernmental Research, Tallahassee, Florida, 1980.

Schubert, Jane G. and Robert E. Frug. Consumer Fraud: An Empirical Perspective Summary. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., June 1979.

Sheldon, Jonathan A. and George J. Zweibel. Survey of Consumer Fraud Law. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., June 1978.

Skoler, Daniel L. Governmental Structuring of Criminal Justice Services: Organizing the Non-System. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., July 1978.

\_\_\_\_\_. Subcommittee on Crime of the Committee on the Judiciary, House of Representatives. White Collar Crime: The Problem and the Federal Response. 95th Congress, 2d Session, June 1978.

\_\_\_\_\_. U.S. Securities and Exchange Commission. Ponzi and Pyramid Schemes. Washington, D.C.

Van Maanen, John. The Process of Program Evaluation: A Guide For Managers. National Training and Development Service Press, Washington, D.C., 1973.

Villano, Clair E. Complaint and Referral Handling. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., May 1980.

Weidman, Donald R., John D. Waller, Dona MacNeil, Francine L. Tolson and Joseph S. Wholey. Intensive Evaluation For Criminal Justice Planning Agencies. Law Enforcement Assistance Administration, Washington, D. C., 1975.

Weiss, Carol H. Evaluation Research, Methods for Assessing Program Effectiveness. Prentice-Hall, Inc., Englewood Cliffs, New Jersey, 1972.

Whitcomb, Debra. Connecticut Economic Crime Unit. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., September 1979.

Wildhorn, Sorrel, Marvin Lavin, Anthony Pascal, Sandra Berry and Stephen Klein. Indicators of Justice: Measuring the Performance of Prosecution, Defense, and Court Agencies Involved in Felony Proceedings. Rand, Santa Monica, California, 1976.

Williams, Jay R. et al. Police Narcotics Control: Patterns and Strategies-Summary. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., July 1979.

Williams, Jay R. et al. Police Narcotics Control: Patterns and Strategies. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., July 1979.

Zweibel, George T. Federal Law on Consumer Deception: An Agency by Agency Analysis. U.S. Department of Justice, Law Enforcement Assistance Administration, Washington, D.C., June 1979.



**END**