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***CLUCKERS, CLOCKERS, AND
COOKERS: AN INTRODUCTION TO
DRUG CONTROL POLICY FOR
SUBSTANCE ABUSE COUNSELORS***

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Cluckers, Clockers, and Cookers: An Introduction to Drug Control Policy for Substance Abuse Counselors

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This distance learning coursework was developed for CEU Matrix by Robert A. Shearer, Ph.D.

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Dr. Robert A. Shearer is a retired professor of Criminal Justice, Sam Houston State University. He received his Ph.D. in Counseling and Psychology from Texas A & M University, Commerce. Prior to teaching Criminal Justice, he taught Educational Psychology at Mississippi State University on campus and in the extension program across rural Mississippi during the civil rights era.

He has been teaching, training, consulting and conducting research in the fields of Criminal Justice, human behavior, and addictions for over thirty-six years. He is the author of over sixty professional and refereed articles in Criminal Justice and behavior. He is also the author of *Interviewing: Theories, techniques, and practices, 5th edition* published by Prentice Hall. Dr. Shearer has also created over a dozen measurement, research, and assessment instruments in Criminal Justice and addictions.

He has been a psychotherapist in private practice and served as a consultant to dozens of local, state, and national agencies. His interests continue to be substance abuse program assessment and evaluation. He has taught courses in interviewing, human behavior, substance abuse counseling, drugs-crime-social policy, assessment and treatment planning, and educational psychology. He has also taught several university level psychology courses in the Texas Department of Criminal Justice Institutional Division, led group therapy in prison, trained group therapists, and served as an expert witness in various courts of law.

He has been the president of the International Association of Addictions and Offender Counseling and the editor of the *Journal of Addictions and Offender Counseling* as well as a member of many Criminal Justice, criminology, and counseling professional organizations prior to retirement.

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Cluckers, Clockers and Cookers: An Introduction to Drug Control Policy for Substance Abuse Counselors

*by Robert A. Shearer, Ph.D.
Sam Houston State University*

Goals and Objectives

Goals: The goals of this course are for the student to understand:

- The nature of drug control policy
- The types of drug control policies

Objectives: The objectives of this course are for the learner to:

- Understand the need for counselors to be concerned about international drug policies
- Understand the economic foundation of international drug markets
- Understand the strategic targets of drug control policy
- Know the street terms of the international drug trade
- Understand the control strategy of demand reduction
- Understand the drug control strategy of harm reduction
- Understand the drug control strategy of trafficking reduction
- Understand the drug control strategy of legislation
- Understand the drug control strategy of decriminalization
- Understand the drug control strategy of control focus
- Know how to measure endorsement of international drug policy strategies

Pedagogy: The learning techniques used in this course

- Reading comprehension
- Visual aids
- Node mapping
- Instrumented feedback

Introduction

Illegal drugs are an international problem. Few countries, large or small, are not affected by the manufacture, sale, use, or distribution of illegal drugs. Almost every country in the world is affected. This globalization of the spread of illegal drugs is reflected in the vast programs and services of the United Nations Office on Drugs and Crime (UNODC). This office of the United Nations studies global drug trends and establishes policy guidelines to reduce the supply and demand for drugs. In addition, the UNODC is concerned with drugs as they affect terrorism, corruption, human trafficking, and HIV/AIDS prevention. The core of international drug control policies consists of a variety of strategies used by governments to control the global drug abuse problem. In addition, *The President's National Drug Control Strategy* (ONDCP, 2006) consists of a three-priority strategy: Stopping the use of drugs through education and community programs; treating drug users; and interdiction operations that attack the markets that support drug trade. Consequently, the United States has an official strategy characterized by demand reduction, supply reduction, and trafficking interdiction. Trafficking interdiction consists of eradication, organizational attack, and airport interdiction.

Drug Control Policy and the Counselor

This course is about national and international drug control policy. Why does a substance-abuse counselor need to be informed and concerned about a topic that is seemingly quite remote from the client? The three most obvious reasons are:

- Drug usage tends to follow epidemics with periods of peak involvement and eventual decline. At any one time in history, a counselor is likely to encounter offenders who are using substances quite different from those of only a few years before. Drug epidemics are constantly changing.
- Drug control policy involves very controversial economic, political, social, and legal issues that surround the substance using offender. These issues may be very complex, and the counselor needs to be at least one step ahead of the substance user in understanding these issues.
- We live in a global society and drugs are correspondingly international in nature. Drugs can be bought and sold over the internet, and cross border transit of drugs is widespread. A substance abuse counselor is working with individuals caught up in this international industry, so he/she needs to understand the extensive nature of how a particular drug found its way to the substance abusing offender.

Preliminary Considerations

Before investigating the various aspects of drug control policy, some preliminary considerations are offered for thought and discussion concerning the relationship between drugs and people.

- Drug use has been speculated as a basic human activity found in almost every human culture in every age of history.

- Drugs have two faces. One face is ugly, lethal, and dangerous. The other face is therapeutic, pleasurable, and creative.
- Until recently, traditional societies controlled drugs by tight social and cultural controls. Drugs, for these societies, were not seen as a problem.

Economic Catalyst of the Drug Industry

The international drug trade is driven by money. This money is a catalyst for all aspects of the drug industry. Figure 1 presents a visual representation of the economic aspects of drug production, trafficking, sales, and consumption. Note the following in the figure:

- Drug production and manufacturing usually involve precursors. These precursors are the chemicals and ingredients required to manufacture the drug.
- Drug accessories have to be purchased to package the drugs. Typically, this involves wrapping tape, plastic wrapping, and containers.
- Drug trafficking requires anything from airplanes to high speed boats to specially designed or altered vans and automobiles.
- Money laundering requires a method to hide large amounts of cash. This is typically accomplished through a legitimate or phony business.
- Drug sales require freelance or organized sales organizations.
- Most of the cash returns to producers and dominate drug cartels that start the cycle over.
- The entire cycle requires many firearms, other weapons, and security devices, to protect the product from production to the consumer.

In addition, international drug trade is driven by economic market realities. Some of these realities are:

- As enforcement and criminal sanctions increase, the price of drugs increases. Drug enforcement increases the cost of drugs for the consumer, making drug production more profitable for the supplier, producer, and dealer.
- Despite the increase in drug enforcement, the supply of drugs has increased with expanded drug trafficking. Drug producers simply produce more drugs and alter or expand their markets.
- Drug enforcement tends to cause drug trafficking to move to weaker jurisdictions, so that production can continue at a high level of profit and a lower level of risk.
- Drug enforcement tends to force drug producers to create more sophisticated organizations to distribute drugs.
- Drug enforcement tends to increase the purity of a drug so that if the drug is not seized, it can be divided and diluted for greater distribution and profit. For a producer, it makes more sense, economically, to produce illegal whiskey than illegal beer or wine, because whiskey has greater alcohol content with a correspondingly higher economic value.

- The money obtained by criminal entrepreneurs from drug trafficking is used to fund terrorist activities. *NARCO-Terrorism* is the international connection between drugs and terror. Illegitimate drug enterprises use drug money to fund:
 - A. Revolutionary groups
 - B. Resistance guerillas
 - C. Secret intelligence operations
 - D. Terrorist organizations

Terrorist groups exploit the advances in technology, finance, communications, and transportation for economic and political goals. Consequently, *NARCO-Terrorism* blurs the line between purely economic goals and political goals.

In the final analysis, international drug markets operate according to traditional supply and demand principles because they involve production, distribution, sale, and consumption of a product, even though the product is illegal.

Figure 1
Economic Aspects of International
Drug Production, Trafficking, Sale, and Consumption

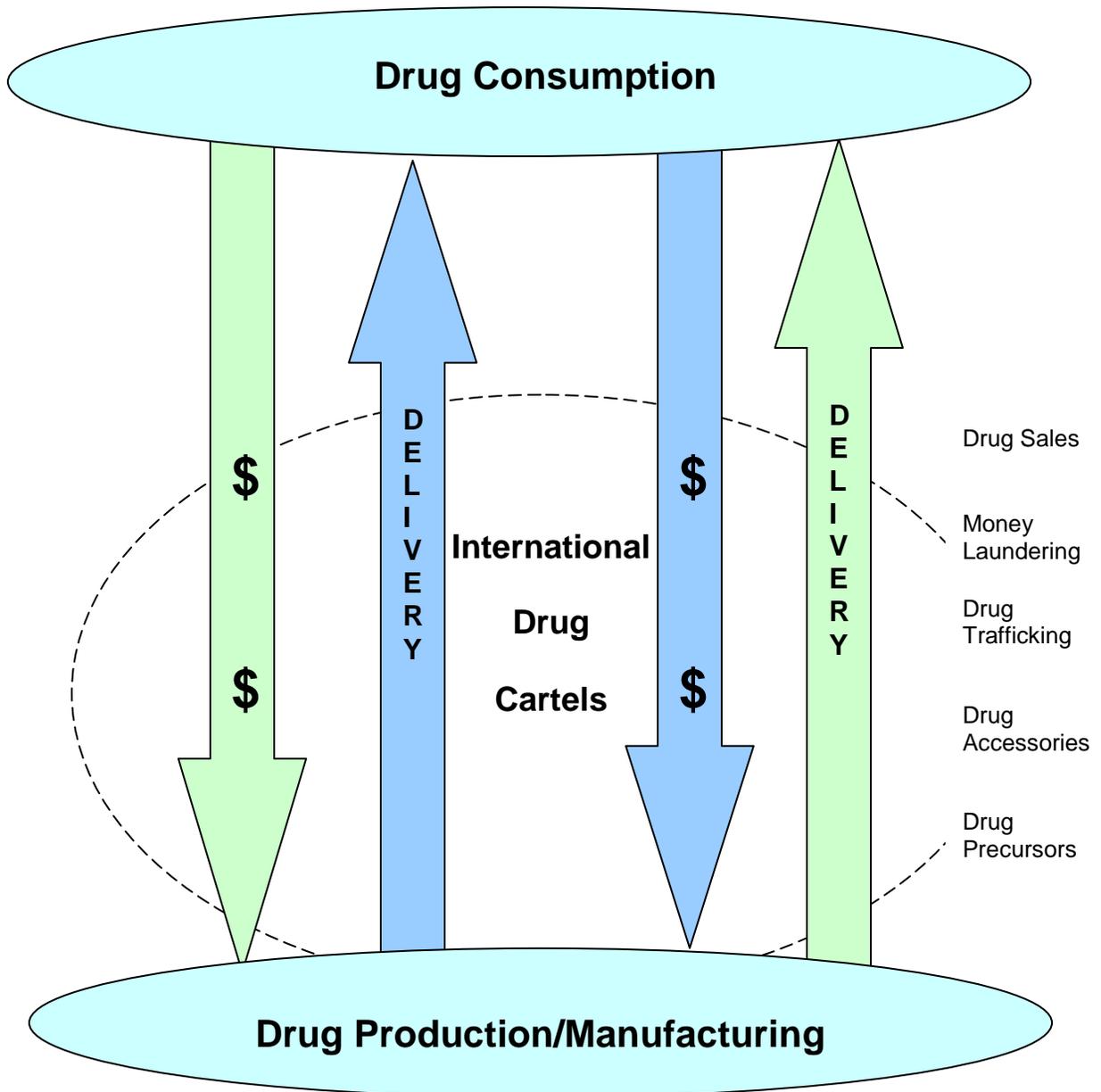


Figure 2
Strategic Zones of Drug Control Policy:
Producing Country

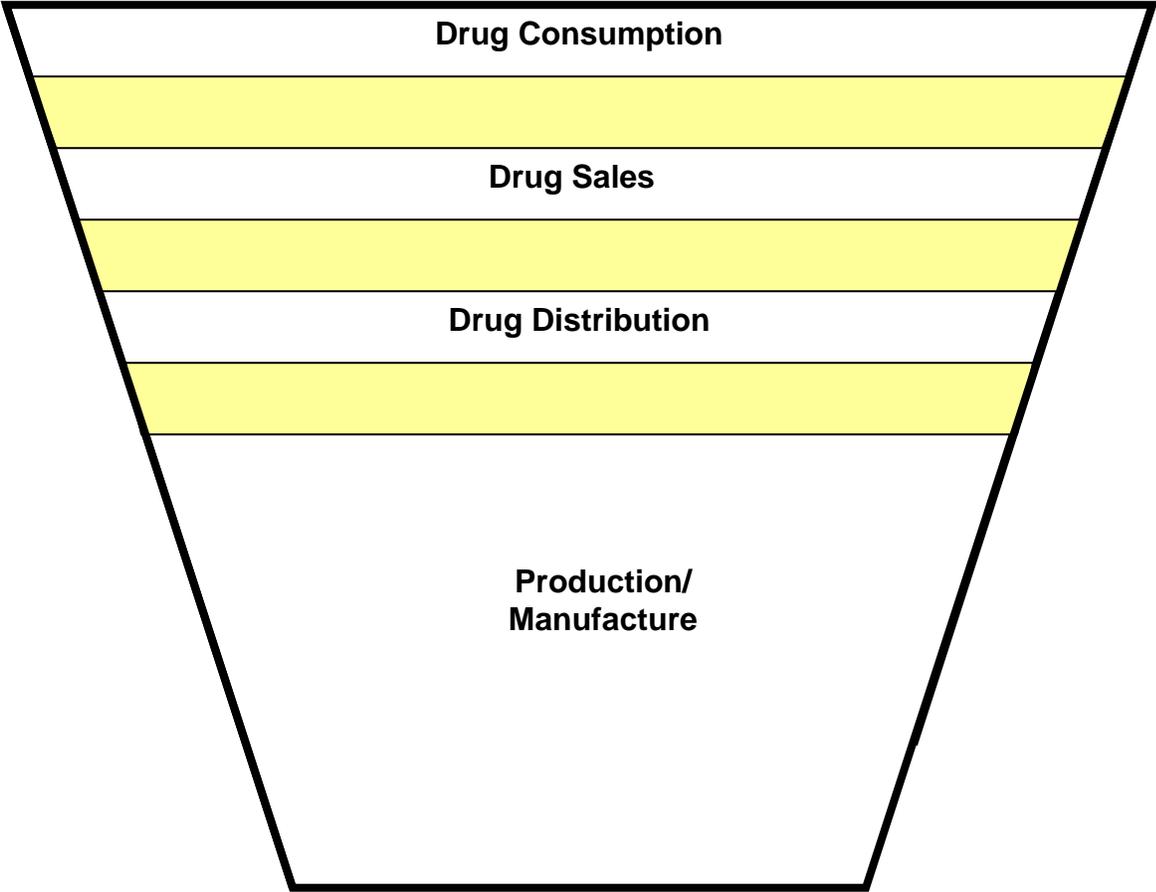


Figure 3
Strategic Zones of Drug Control Policy:
Consuming Country

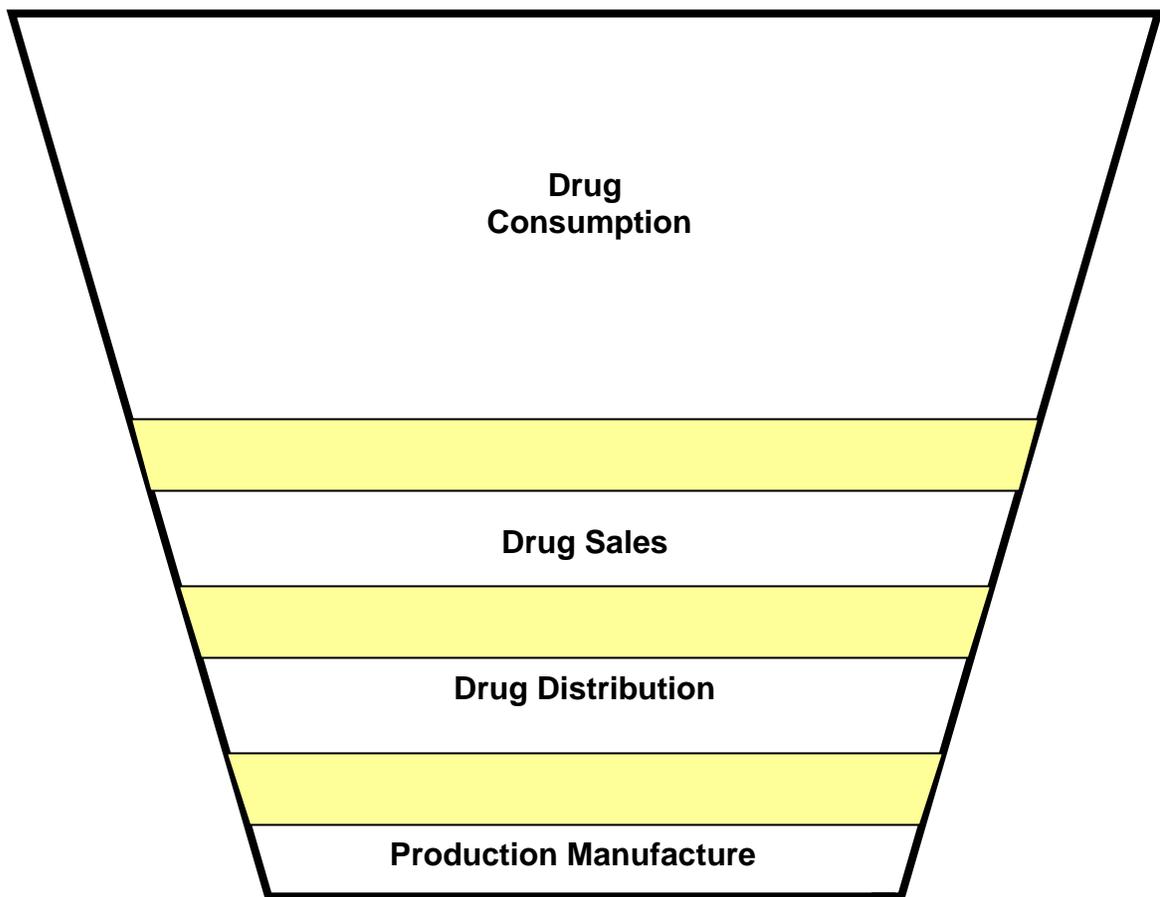
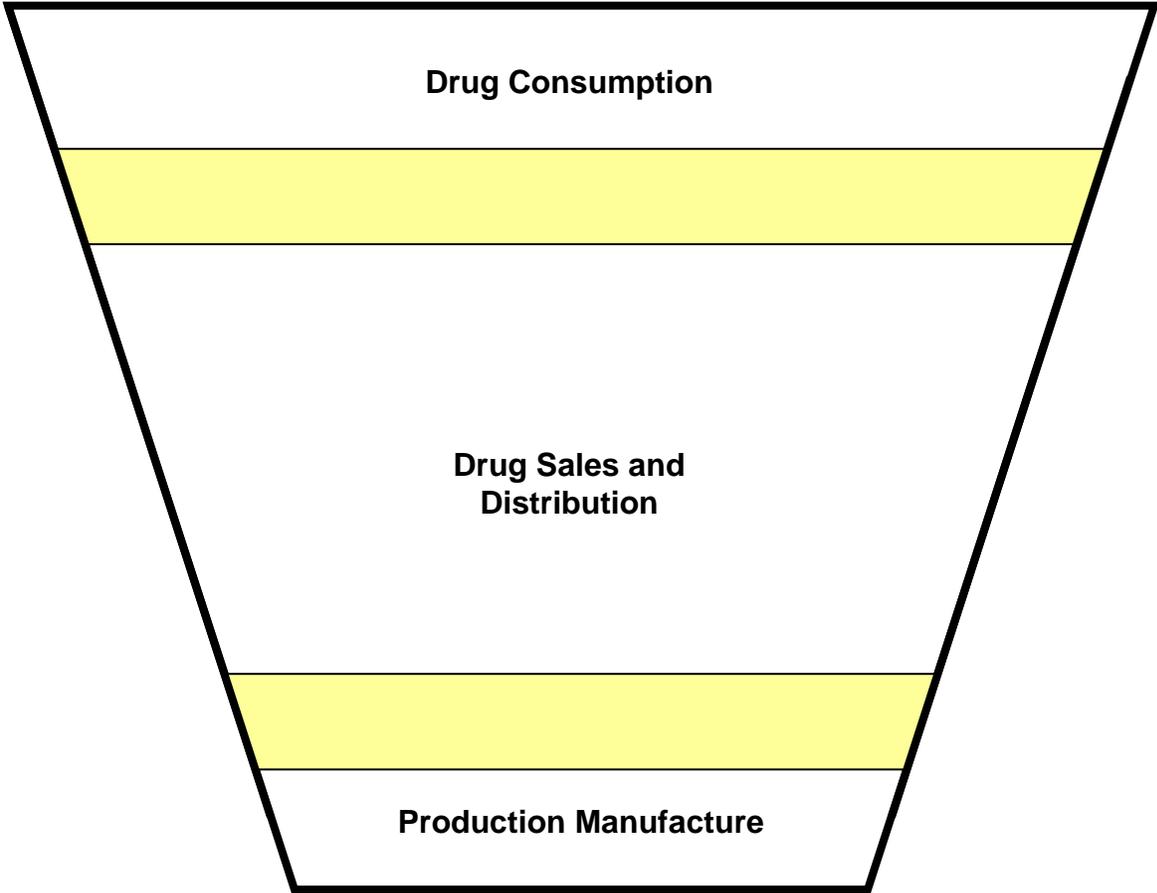


Figure 4
Strategic Zones of Drug Control Policy:
Trafficking Country



Strategic Zones of the Drug Control Policy

Drug control policy typically is targeted at four zones in the drug industry: production, distribution, sales, and consumption.

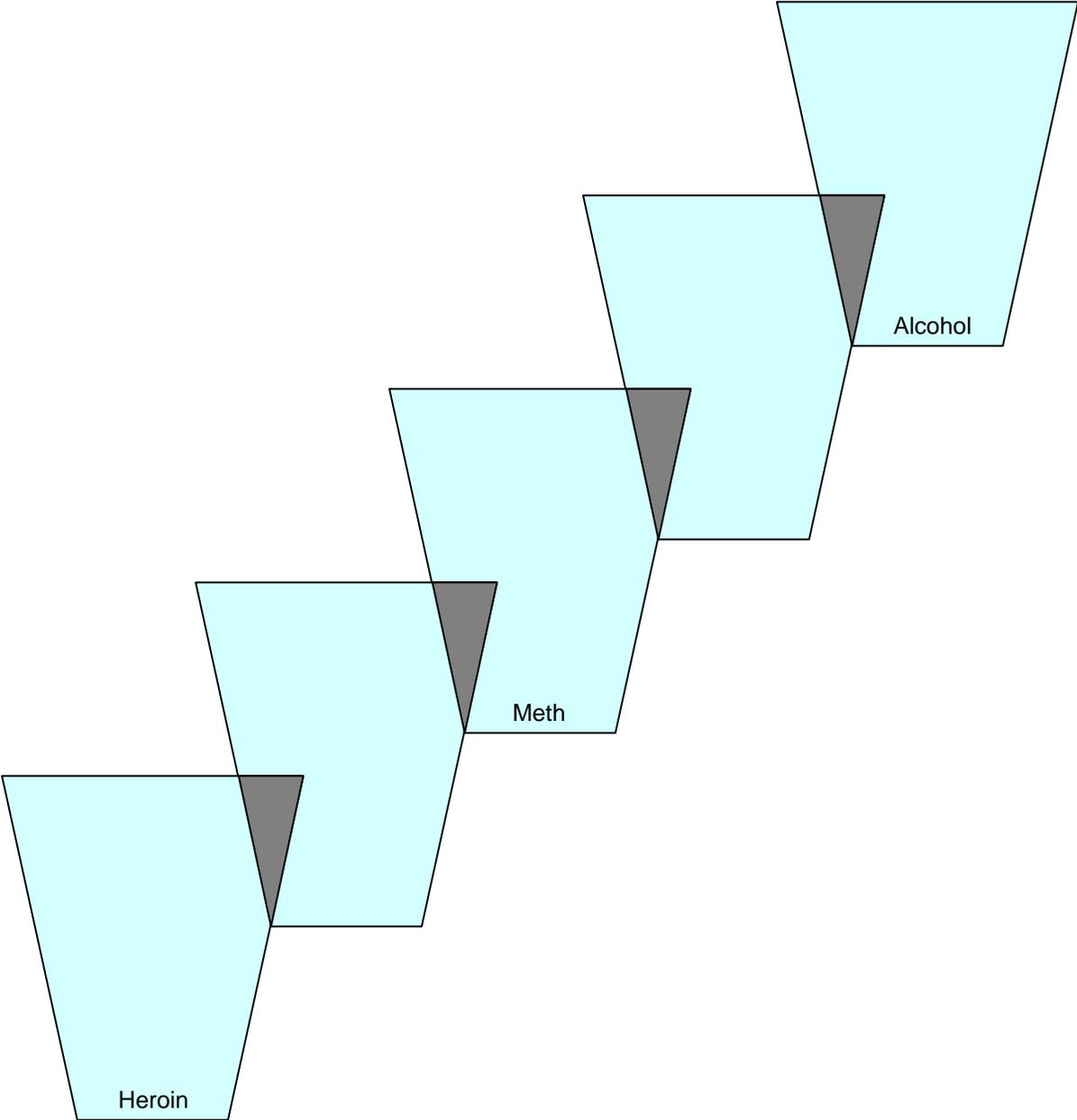
Figure 2 presents a visual representation of control strategies for producing or manufacturing countries. The shaded areas represent overlap in the zones.

Figure 3 presents a visual representation of the zones for policy strategies for consuming countries. In this figure, most of the illegal drug activity is confined to using drugs.

Figure 4 presents a visual representation of the zones for policy strategies for countries that are primarily pass-through nations. The primary drug activities in these countries are sales and distribution.

Finally, figure 5 presents a visual representation of how these strategic zones may overlap for multiple drugs. In other words, a country may be engaged in the production or trafficking of several drugs, using the same chain of distribution for several drugs. In addition, a country may change the primary drug for production or distribution as drug control forces or profit levels may dictate. For example, meth is now being smuggled into the U.S. along with cocaine. This change in drug production or distribution can be one of the contributing factors to an increase or decline in drug epidemics.

Figure 5
Strategic Zones of Drug Control Policy for Multiple Drugs



Street Terms in the International Drug Trade

The ability to understand drug-related street terms is an invaluable tool for substance-abuse counselors. An understanding of these terms provides:

- An appreciation of the diversity and creativity of drug users in creating a language of their own.
- An increased ability to communicate with substance users and abusers.
- An appreciation of the language used to refer to a variety of drugs around the world.

Trafficking Terms

Bag Man—A person who transports money: A pusher.

Big Man—Drug supplier.

Blue de hue—Marijuana from Vietnam

Blue Sky Blond—High potency marijuana from Columbia.

Body Packer—A person who ingests wrapped packets of crack or cocaine for transport.

Box Labs—Small mobile, clandestine labs to produce meth.

Caballo—Spanish for Heroin.

Cabello—Spanish for Cocaine.

Calbo—Spanish for Heroin.

Candy Man—Drug supplier.

Cap Up—Transfer bulk form of drugs to capsules.

Carga—Spanish for Heroin.

Carne—Spanish for Heroin.

Chiba Chiba—High potency marijuana from Columbia.

Clocker—An entry level dealer who sells drugs 24 hours a day.

Clucker—Middle men who facilitate the connection between buyers and sellers.

Cooker—A person who manufactures meth.

Cruz—Opium from Veracruz, Mexico.

Giro house—A non-bank financial institution for businesses: Frequently used to launder drug proceeds.

Juggler—A teen-aged street dealer.

Mule—A carrier of drugs.

Paper Boy—A heroin peddler.

Runners—People who sell drugs for others: Adolescents who act as liaisons between sellers and buyers.

Steerer (tout)—A person who directs customers to spots for buying crack or where drugs are sold.

Swallower—A drug courier.

Travel Agent—LSD supplier.

Zoomer—An individual who sells fake crack and then flees.

Drug Terms-International

Acapulco Gold—Marijuana from Southwest Mexico.

AIP—Heroin from Afghanistan, Iran, or Pakistan.

BC Bud—Marijuana from British Columbia.

Bhang—Indian term for marijuana.

Black Gungi—Marijuana from India.

Dagga—Marijuana from South Africa.

Dimba—Marijuana from West Africa.

Ganja—Marijuana: Term from Jamaica.

Indian Hay—Marijuana from India.

Kabak—Turkish Marijuana.

Kaff—Very potent marijuana from Morocco, Lebanon, and other Arab/Middle Eastern countries.

Khyaf—Same as above.

Kief—Same as above.

Maui-Wowie—Marijuana from Hawaii.

Monte—Marijuana from South America.

Northern Lights—Marijuana from Canada.

Ruderalis—Cannabis from Russian.

Triple A—Marijuana from British Columbia.

Ya Ba—A pure and powerful form of methamphetamine from Thailand:
“Crazy Drug.”

Zacatecas Purple—Marijuana from Mexico.

Drug Control Strategies

International drug policy tends to be driven by a variety of drug control strategies. The various strategies are identified in both the literature of international drug control and the documents of domestic and international drug control policy. Any one or group of strategies may be endorsed by a state, country, or region so that the importance of a particular strategy tends to drive drug control policy, which, in turn, leads to the allocation of resources to control illegal drugs. A brief description of some of the prominent strategies is presented herein; it should be noted they are not in any order of importance or priority.

Demand Reduction

The drug control strategy of reducing the demand for illegal drugs is a widely proposed approach to the drug problem. Demand reduction typically involves programs to prevent drug use and abuse; and treatment programs for drug use, abuse, dependency, and addiction. The logic supporting the strategy of demand reduction is essentially the same as prohibition. The drug problem will not exist if there are no drug users. Consequently, drug prohibition, however effective, can be viewed as a demand reduction strategy for those individuals who view the illegality of the behavior as sufficient reason to refrain from engaging in illegal drug use.

Demand reduction is the United Nations' primary focus in the global task of countering the world drug problem.

Harm Reduction

The strategy of harm reduction is based on maximizing individuals and community health through participation rather than repression. It recognizes that the response to the drug problem may be more harmful than the drugs themselves. In harm reduction, drug use is viewed as neither right nor wrong. The focus instead is the harm related to the use of substances. Harm reduction strategies recognize the reality that we cannot eliminate drug use, but we can reduce the related dangers of drug use.

The most popular harm reduction programs are methadone maintenance, needle exchange programs, medically supervised injection sites, and HIV/AIDS information programs. Support for the strategy of harm reduction is sharply divided. The national and international "war on drugs" tends to focus on enforcement, criminal law, and a justice response to the drug problem. Other sources support harm reduction. In any case, the strategy of harm reduction has been successful in some countries, unsuccessful in other countries, and not tried to any extent in other countries.

Trafficking Reduction

The drug control strategy of reducing the trafficking, distribution, and selling of illegal drugs is known as trafficking reduction or distribution interdiction. This strategy focuses on reducing the distribution of drugs by transnational consortiums. The goal is:

1. Stop the acquisition of chemicals used to produce drugs.
2. Disrupt the transporting of drugs to wholesale distributors.
3. Stop the laundering of profits that are interacting with and blending into legitimate markets.
4. Destroy the international cartels that are responsible for trafficking and distribution of illegal drugs.

The trends in drug markets, including production and trafficking, are monitored by the United National Office on Drugs and Crime and *The Presidents National Drug Control Strategy*.

Interdiction efforts directed at drug trafficking vary across the globe, although the international nature of drug trafficking prevents any country from combating the trade alone. Organizations such as the United Nations Office for Drug Control and Crime Prevention are working to maintain and assist international interdiction activities and encourage countries to join international drug control efforts. The US government has officially called for a "War Against Drugs;" and, consequently, the nation plays a

leading role in the push for aggressive counter-drug tactics across the globe. Their activities focus on interdiction and eradication operations in drug transit zones and source countries, and also urge other countries to adopt 'drug war' policies.

Despite these efforts, it is estimated by the United Nations that only 10-15 percent of heroin and 30 percent of cocaine is intercepted worldwide. At least 70 percent of international drug shipments need to be intercepted to substantially reduce the industry. Reports suggest that there has been an increase in successful interceptions; however, the drug market continues to produce the same, or even higher, quantities of illicit drugs. Developed efforts of drug control authorities in some countries have merely moved drug trafficking operations to weaker jurisdictions and forced greater organizational sophistication. Economists call this the balloon effect since squeezing by law enforcement in one area only leads to a rise elsewhere.

This "balloon effect" is commonly seen in South and Central Asia, and Latin America, where the majority of illicit drugs is produced and trafficked and where international interdiction efforts are focused. Drug trafficking continues to expand, with networks including cross-border cooperation and international connections. This growth and increased organization results not only from an expanding consumer market, but from poverty. The war against drugs increases the cost of drugs, making drug production and sale more profitable and therefore more attractive – particularly to those living in poverty. Drug trafficking across the world exists as a \$400 billion (US) trade – drug traffickers earn gross profit margins of 300 percent.

In recent times some nations have shifted their drug policy focus away from law enforcement and interdiction towards harm-reduction based on the idea that reducing consumption will help to stem profitability and, therefore, the flow and production of controlled drugs. Harm reduction moves government resources currently devoted to punitive approaches and interdiction efforts towards a focus on drug education and affirmative alternatives to drug abuse and incarceration. This would reduce the use of drugs, and the reduction of drug trafficking (and therefore the need for interdiction) would follow.

Drug trafficking involves smuggling operations which are a small part of the underground or informal economy. Drug smuggling is a major component of this economy; but, when considered with all of the other smuggling operations, it is only one of many items being smuggled around the globe. Figure 6 presents a visual representation of the flood of international smuggling operations. This view of drug trafficking and distribution is a reminder that international drug distribution resembles a capitalist enterprise, especially in America.

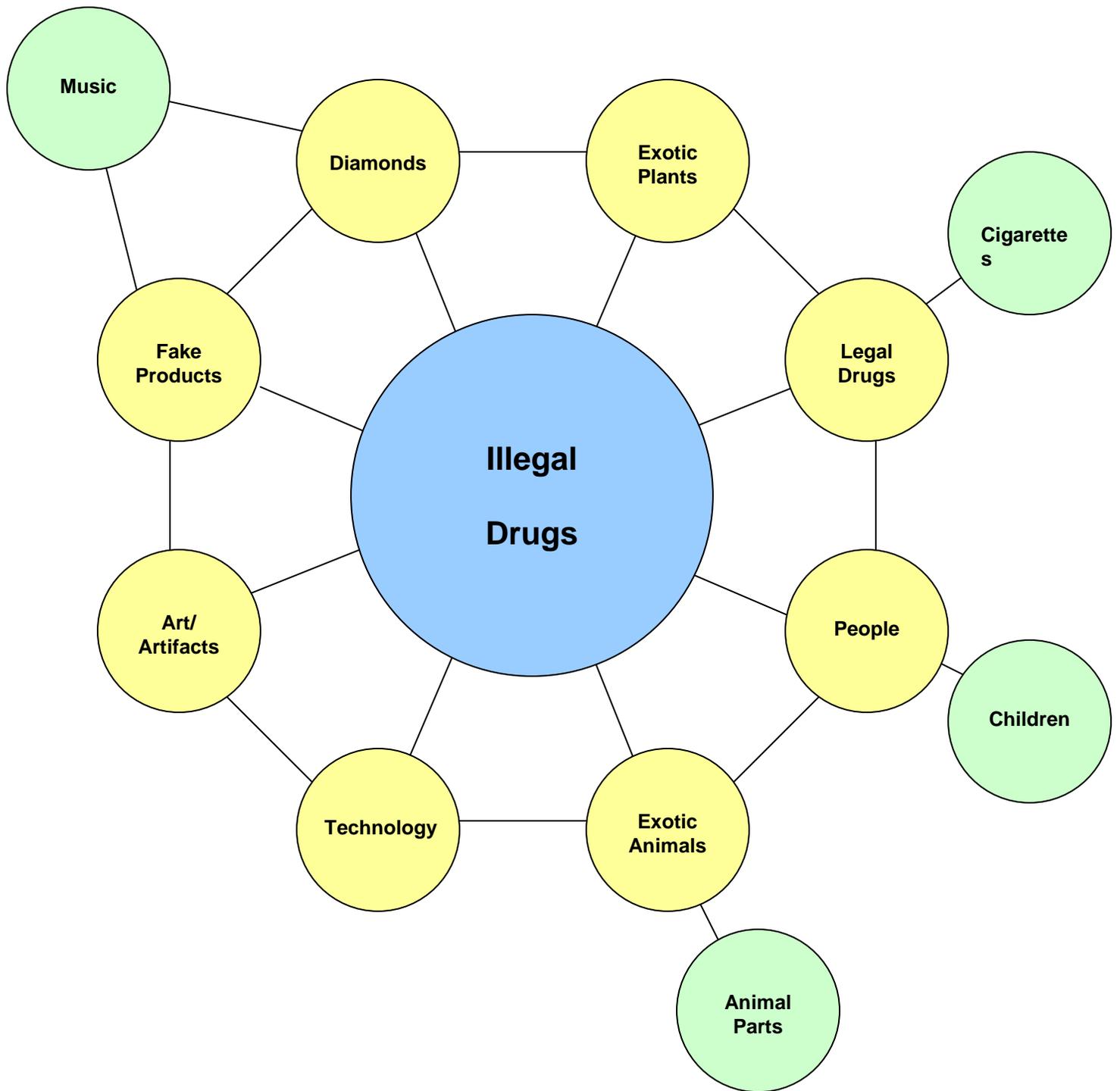
Supply Reduction

The drug control strategy of supply reduction is designed to reduce the availability of drugs so that drugs become expensive and difficult to obtain. Therefore, fewer people will use drugs. Supply reduction targets the production of illegal drugs by seizing equipment and money used to produce illegal drugs. In addition, cultivation, production, and trafficking are targeted. Efforts are made to encourage growers and producers to switch to profitable crops and other sources of income through:

- Alternative development projects
- Community development
- Natural resource management
- Income generating projects

Despite the vast amounts of money, equipment, and people dedicated to supply reduction, the effectiveness of supply reduction strategies by crop eradication, for example, has been seriously questioned. Consequently, the strategy of supply reduction continues to be debated on the issue of effectiveness.

Figure 6
The Flood of International
Smuggling Operations



Legalization

The drug control strategy of legalization is a form of harm reduction. Very few countries have turned to complete legalization of drugs, and most of the debate over legalization focuses on reforming the laws against the use of cannabis. A radical legalization strategy would involve a government agency being assigned to control the production, distribution, and sale of drugs. It is argued that legalization would reduce the vast quantities of money involved in drug trade and the associated criminal activity. On the other hand, drug legalization has been discouraged by a number of people. Three immediate disadvantages of legalization are:

- Legalization will attract many drug users, particularly serious users, to the country that legalizes drugs.
- Legalization will create a new massive government agency to oversee the cultivation, production, quality control, import, and distribution of drugs, as alcohol is today in some countries.
- Legalization will place an immediate strain on a nation's healthcare system as more people need health assistance because of drug abuse.

Several advantages of legalization are:

- Criminal costs would be substantially reduced.
- Prices of illegal drugs would fall so the profit would decrease, as well as the corruption in the criminal justice system.
- The crimes committed to obtain drugs and fund drug use would decline.
- The money spent on prosecution and incarceration of drug users could be spent on drug education and treatment.

Alcohol is a legal drug in many countries, and the prohibition of alcohol has historically been a serious failure. Most countries are not ready to legalize other drugs, particularly the most dangerous varieties. Whether other drugs follow the lessons learned from the prohibition of alcohol, remains to be seen.

Decriminalization

The drug control strategy of decriminalization is another form of harm reduction that falls short of legalization of drugs. It involves defining the drug problem as a public health problem rather than a moral failure handled by the courts and the criminal justice system. This strategy would, theoretically, reduce corruption, imprisonment, and the cost of law enforcement. Nevertheless, most drugs would continue to be illegal, but drug users would be handled through education and treatment. In essence, decriminalization simply refers to removal of the criminal penalties associated with the possession of illegal drugs. The manufacture, distribution, and sale of illegal drugs would still carry criminal penalties. Several European countries have moved in the direction of decriminalization.

Decriminalization has many of the advantages and disadvantages of legalization. One important disadvantage of decriminalization is the clinical designation of

addicted or substance abusing offenders. Clinically, most substance abusing offenders are treated as having a dual diagnosis of both “criminal” and “addicted.” If only the addiction is addressed, then the result is an offender still possessing strong criminal tendencies. Consequently, once drug abusers have been previously processed by the criminal justice system, then the individuals with strong criminal tendencies will be thrust into a public health care system. Many people feel this could be a health care disaster and potentially dangerous to health care workers. The critical question is the degree to which the present population of substance abusing offenders is “addicted criminals” versus “criminal addicts.”

Control Focus

The final drug policy strategy concerns the degree of control nationally or internationally that is exerted to control illegal drugs. The issue in this strategy is whether drug control should be emphasized at the national level or international level, sometimes referred to as cross-national. Obviously, the issue does not have to be an either-or proposition, but the strategic differences are quite profound. For example, at the international level, we presently have no effective system to indicate the quantities of drugs that are being produced or consumed. In addition, some countries use the pretext of national sovereignty to avoid meeting the responsibilities and needed cooperation with other countries. Likewise, the permeability of borders makes cross-national and national drug policies difficult to enforce. There are few easy solutions to the problems of international drug policies. It is suggested that cross-national enforcement should focus on the cartels, the trafficking networks, wholesale distributors, and money laundering activities. Nevertheless, there is not optimism about the prospects of these efforts being successful. Finally, new information technologies have globalized the drug problem by creating e-markets that blur national boundaries. Illicit drugs can be purchased online as a form of e-commerce.

IDPI

The *International Drug Policy Inventory* appears at the end of this course for the student to explore his/her beliefs about the various strategies of drug control. A scoring key accompanies the inventory.

The IDPI was developed because of the lack of research on policy analysis and the seemingly irrational construction of drug policy.

The IDPI consists of forty-seven items or statements about international drug policy that were rationally determined after being extracted from the literature of drug policy. Responses to the inventory are indicated on an “agree-undecided-disagree” format and scored 2-1-0 respectively. Several items are reverse scored (0-1-2). A total score is not obtained on the instrument.

In fact, the IDPI consists of seven sub-scales across which the 47 items are distributed. The sub-scales are: *Demand Reduction* (DR), 6 items; *Supply Reduction* (SRJ), 8 items; *Legalization* (LG), 6 items, *Decriminalization* (DC), 6 items; *Distribution Interdiction* (DI), 9 items; *Control Focus* (CF), 6 items; and *Harm Reduction* (HR), 6 items.

Except for the possible normative data created by this study and the face validity of the instrument, no other validity information is available for the IDPI. The internal reliability of the instrument was provided concurrently with this study. The reliability coefficient (Alpha) for the scale (N=57; 47 items) was .69. The internal reliability coefficients for the subscales were: DR=.42, SR=.79, LG=.81, DC=.82, DI=.81, CF=.52, and HR=.58. All of these coefficients appear to fall in acceptable ranges for continued use of the IDPI as a reliable inventory.

World Drug Policy Source Countries and Transit Zones

Drug policies and the threat of drugs worldwide vary from country to country and region to region. The following section of this course provides an introduction to these countries and regions.

Southeast Asia

Burma accounted for approximately 12 percent of the total illicit opium cultivation in the world in 2004. However, only one percent of these opiates made it to the retail market in the United States in 2004.

The primary drug threat to the United States from South East Asia is the production of heroin and opium from “the Golden Triangle,” comprised of Burma, Laos, and Thailand.

Burma is the second largest producer of illicit opium and opium poppy. However, according to the latest Domestic Monitoring Program report published by the Drug Enforcement Administration, only one percent of the heroin in the retail market of the United States originates in Southeast Asia.

Thailand has ceased to be a major source country for opium poppy or heroin.

Laos, in conjunction with the United Nations Office on Drugs and Crime, announced that it was opium poppy free in 2006.

Peru

Of the estimated 38,000 hectares of coca cultivation in Peru in 2005, 4,000 hectares were located in areas that had not been surveyed before.

Peru had been the largest producer of cocaine until coordinated interdiction and eradication operations reduced its position to a distant second to Colombia. Coca cultivation increased to 38,000 hectares (ha) in 2005, the highest level in the last eight years. Systematic attacks by Sendero Luminoso (SL) terrorists and violent coca growers against government counter-drug forces limited the pace of eradication until new security techniques were implemented. Those techniques enabled eradicators to recover their previous rate of eradication and destroy 8,966 ha in 2005, accomplishing Peru's international commitment. Eradication forces entered the Upper Huallaga Valley, a traditional coca growing area, for the first time in years, causing a decrease in its cultivation and signaling that all areas of illicit cultivation are subject to eradication. Peru's average cocaine production potential over the past 5 years is 160 metric tons, about a third of the production potential at the height of Peru's coca production. Peruvian traffickers smuggle the majority of their product to Europe and South America.

The Peruvian coastline offers 23 maritime ports of which 5 are considered major. They are particularly prized by traffickers for the relative ease in smuggling sizable quantities of cocaine in legitimate cargo. Large cocaine shipments to Mexico could also indicate an increased Mexican drug trafficker presence and a corresponding increase in lab efficiency and sophistication of the trafficker transportation network.

The Peruvian Government has responded to these challenges by aggressively attacking narcotrafficking in all its forms. Counter narcotics forces have launched retaliatory strikes on narcoterrorists; and, with US support, Peru has expanded government presence in the coca growing areas. Recently established police academies have produced nearly 1000 police officers to provide security for the eradication forces and surrounding localities. These additional police helped Peru achieve a record year in seizures with over 15 MTs of cocaine, 1,424 MTs of coca leaf, and 648 MTs of precursor chemicals (required to produce cocaine), and more than 500 base labs destroyed.

Europe

MDMA (Ecstasy) is the primary drug threat from Europe, although Ecstasy use among U.S. teens has fallen dramatically since 2002.

Europe is a major source of synthetic drugs such as MDMA (Ecstasy) and the precursor chemicals required to produce them. In recent years, however, tremendous progress has been made in reducing the threat that European drugs pose to the United States. In the past 2 years, total U.S. seizures of MDMA have declined from 11 million tablets to less than 3 million tablets, indicating a significant

reduction in flow. Ecstasy use among U.S. has dropped by two-thirds since 2002. Much of this success can be attributed to increased counter narcotics cooperation between the United States and the Netherlands.

The U.S. also works closely with the European Union and its organizations to share drug policy information and counter drug trafficking. The U.S. cooperates bilaterally with EU countries such as the United Kingdom, The Netherlands, Brussels, Spain, and Italy.

In general, domestic drug policy in Western European nations continues to focus on the social welfare aspect of drug use, with a reduced focus on law enforcement. Alternative policies that have gained advocates in Western Europe include harm reduction programs, such as needle exchanges, and even decriminalization and legalization. Recently, however, some of these countries have begun to increase their law enforcement response to the drug trade. For example, in 2005, the Netherlands mobilized the National Crime Squad (NR), which in July managed to significantly disrupt one of Europe's largest ecstasy production organizations.

Columbia

Aerial eradication efforts caused a 68 percent decline in Colombian opium poppy cultivation between 2001 and 2004.

Columbia is the source of over 90 percent of the cocaine entering the United States and significant source of the heroin on American streets. In 2005, the U.S. Government sought to gain a more accurate and comprehensive picture of the drug situation in Colombia by conducting a survey of coca cultivation that covered a geographic area 81 percent in the same areas that were imaged in 2004. However, the increased survey area resulted in the discovery of additional coca that had never before been detected. This additional coca resulted in an overall increase in the U.S. Government's estimate of coca cultivation: 144,000 hectares, as opposed to 114,000 hectares in 2004. The U.S. is working with the Government of Colombia to eradicate this coca and reduce the amount of cocaine reaching American streets.

This task is complicated by the internal conflict that exists within Colombia. Terrorist groups such as the FARC, the AUC, and the ELN battle for control of drug-producing areas and use the profits from the drug trade to undermine Colombian democracy and rule of law. Colombian President Alvaro Uribe has countered this narco-terrorist threat by allowing willing groups to demobilize and by attacking those that do not, both directly and by targeting their economic base in the drug trade.

Despite the threat posed by illegal armed groups, Colombia had a record year in 2005 for eradication, interdiction, and extradition. The country's public security forces prevented hundreds of tons of illicit drugs from reaching the world market through interdiction and eradication of coca and poppy crops. Colombia's police and military forces captured or shared in the capture of over 200 metric tons of cocaine

and cocaine base. Colombia also continued its campaign to bring criminals to justice, extraditing several major traffickers to force trial in the U.S. Columbia's efforts, augmented by U.S. assistance, are beginning to show concrete results on American streets as retail cocaine and heroin purities decline and prices for these drugs rise.

Afghanistan

Afghanistan accounts for 87% of global opium production, according to the U.N. Source.

General political and economic circumstances in Afghanistan have improved, but the narcotics situation remains serious, despite positive actions by both the government and international donors. Due to the profound destruction brought about by more than 20 years of conflict, the lack of many viable alternative crops to opium, and the limited enforcement capacity of the central government, Afghanistan is now the largest illicit opium-producing country in the world.

In 2004, 206,700 hectares of opium were under cultivation in Afghanistan. U.S. Government estimates place cultivation in 2005 at 107,700 hectares, a 48% decrease from 2004 levels. Reductions in cultivation in 19 of 26 poppy-growing provinces contributed to this dramatic decrease. Unfortunately, proportionate declines in potential opium production did not occur. Due to favorable growing conditions, potential opium production declined by only 10% from 2004 to 2005.

While Afghan opium cultivation is not a major source of the heroin on American streets, it is important that the U.S. assists the Afghan Government in its fight against the illegal narcotics trade. The illegal drug economy contributes to an environment of corruption and instability that can foster insurgent and terrorist organizations that threaten the democratically elected Afghan Government. The U.S. counter narcotics strategy in Afghanistan pursues the following objectives: 1) build Afghan institutional capacity to sustain the battle against narcotics; (2) assist Afghan authorities to arrest, prosecute, and punish drug traffickers and corrupt Afghan officials; (3) increase the risk and provide economic alternatives to the illegal narcotics trade; and (4) support Afghan Government efforts to make the narcotics trade culturally unacceptable.

The Caribbean

The Caribbean Corridor accounted for approximately eight percent of the total documented flow of cocaine departing South America in 2004. The 2005 flow estimate, although under development, is anticipated to be very similar to 2004.

The primary drug threat to the United States from the Caribbean is the transshipment of cocaine from South America. The Caribbean also plays a prominent role in drug-related money laundering. Many Caribbean countries have

well-developed offshore banking systems and bank secrecy laws that facilitate money laundering.

Since 2004, intense international law enforcement activity against drug trafficking organizations operating in the Caribbean has resulted in the arrest and incarceration of more than 50 key traffickers in Colombia, Panama, Jamaica, Canada, and The Bahamas. These law enforcement actions have directly contributed to a significant decline in the quantity of narcotics documented moving through the central Caribbean, particularly through Jamaica.

Mexico

The U.S. Government estimates that Mexican traffickers receive more than \$13.8 billion in revenue from illicit-drug sales to the United States; 61 percent of that revenue, or \$8.5 billion, is directly tied to marijuana export sales.

Most of the illicit drugs that enter the United States are smuggled across the US-Mexico border. Mexico produces the most heroin and foreign-sourced marijuana in the Western Hemisphere and is the primary transit route for US-bound cocaine. Mexican drug trafficking organizations are also increasingly involved in the production of methamphetamine consumed in the United States. Responding to this challenge requires intense effort by both the United States and Mexico.

Throughout the presidency of Vicente fox, Mexico has demonstrated its commitment to countering the drug threat. The Mexican Army and the Attorney General's Office conduct extensive eradication operations, consistently killing at least 80 percent of the opium poppy and marijuana crop each year. Mexico's action against marijuana is particularly significant, considering that marijuana has become the primary revenue source for Mexican drug trafficking organizations, eclipsing the potential revenue from cocaine, heroin, and methamphetamine combined.

Mexico has also improved the investigative and analytic capabilities of its premier Federal law enforcement institutions. The Federal Investigative Agency (AFI) and the National Center of Analysis, Planning, and Intelligence Against Organized Crime (CENAPI) of the Attorney General's Office have increased their capabilities, resulting in the capture of several major drug trafficking figures.

Mexican authorities seized over 30 metric tons of cocaine hydrochloride (HCl) during 2005. Marijuana interdiction continued at an impressive pace, with authorities confiscating 330 kilograms of heroin, 280 kilograms of opium gum, and 887 kilograms of methamphetamine.

Canada

Past-year cannabis use among Canadians has doubled over the last decade.

Canada is both a consumer and producer of illegal drugs, especially high-potency marijuana and synthetics. Health Canada, the Canadian health ministry, coordinates the government's counter narcotics strategy, although other federal departments, municipal and provincial/territorial governments are fully involved in addressing control of illicit drugs. Internationally, Canadian law enforcement coordinates closely with U.S. counterparts to stem the flow of narcotics into North America and to combat transnational organized crime.

Cannabis cultivation, because of its profitability and relatively low risk, is a thriving industry in Canada. The RCMP has estimated that annual marijuana production in Canada ranges from 1,070 to 2,676 metric tons. Much of this production is in the form of high-potency indoor-grown marijuana destined for export to the United States. The increasing sophistication of Canadian trafficking operations was demonstrated in the summer of 2005, when the first-ever drug smuggling tunnel was discovered on the Washington State-British Columbia border. The increase in marijuana production and trafficking in recent years has been mirrored by increases in drug consumption in Canada, as revealed by the 2004 Canadian Addiction Survey (CAS).

Synthetic drugs have also become an increasing concern in Canada. Regulations instituted in early 2003 helped to reduce the diversion of Canadian pseudoephedrine to the production of methamphetamine in the U.S. "superlabs." Despite this encouraging progress, more must be done to counter the Canadian synthetic drug threat. Methamphetamine has become an increasingly serious domestic drug problem in Canada, and the government has begun to respond through tougher sentencing and by restricting the sale of over-the-counter pseudoephedrine products in some provinces. The production of MDMA (Ecstasy) in Canada and its trafficking to the United States appears to be on the rise, as are seizures of the precursor chemical ephedrine at the U.S. –Canada border.

Fortunately, the United States and Canada can build on an already robust counter drug law enforcement relationship to address these significant drug threats. U.S. and Canadian agencies cooperate extensively through Integrated Border Enforcement Teams (IBETs), regular meetings of the Cross-Border Crime Forum, and cooperative arrangements between the Royal Canadian Mounted Police (RCMP) and U.S. agencies such as the Coast Guard, DEA, and ICE.

Money Laundering and Financial Crimes

Common Abbreviations

AML	Anti-Money Laundering
APG	Asia/Pacific Group on Money Laundering
ARS	Alternative Remittance System
CFATF	Caribbean Financial Action Task Force
CTF	Counter-Terrorist Financing
CTR	Currency Transaction Report
DEA	Drug Enforcement Administration
DHS	Department of Homeland Security
DOJ	Department of Justice
DOS	Department of State
EAG	Eurasian Group to Combat Money Laundering and Terrorist Financing
ESAAMLG	Eastern and Southern Africa Anti-Money Laundering Group
EU	European Union
FATF	Financial Action Task Force
FBI	Federal Bureau of Investigation
FinCEN	Financial Crimes Enforcement Network
FIU	Financial Intelligence Unit
GAFISUD	Financial Action Task Force Against Money Laundering In South America
GIABA	Inter-Governmental Action Group Against Money Laundering
IBC	International Business Company
IFI	International Financial Institution
IMF	International Monetary Fund
INCSR	International Narcotics Control Strategy Report
INL	Bureau of International Narcotics and Law Enforcement Affairs
IRS	Internal Revenue Service
IRS-CID	Internal Revenue Service, Criminal Investigative Division
MENAFATF	Middle Eastern and Northern African Financial Action Task Force
MLAT	Mutual Legal Assistance Treaty
MOU	Memorandum of Understanding
NCCT	Non-Cooperative Countries or Territories
OAS	Organization of American States
OAS/CICAD	OAS Inter-American Drug Abuse Control Commission

OFC	Offshore Financial Center
PIF	Pacific Islands Forum
SAR	Suspicious Activity Report
STR	Suspicious Transaction Report
UN Drug Convention	1988 United Nations Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances
UNGPML	United Nations Global Programme against Money Laundering
UNODC	United Nations Office for Drug Control and Crime Prevention
UNSCR	United Nations Security Council Resolution
USAID	Agency for International Development
USG	United States Government

Introduction

The January 2007 seizure of a staggering \$80 million worth of drug trafficking cash and gold in one law enforcement operation in Colombia points to much of what remains dangerous about the global drug and crime trades as well as improving international efforts to combat them. In an age where much of the world's anti-money laundering effort has understandably become focused on countering the terrorist financing threat, this seizure underscores the enormity of funds and profits wrapped up in transnational crime and the potential power that crime syndicates have with this money to inflict substantial political, economic, and social damage on governments and societies around the world. This \$80 million seems to be the product of an extraordinarily complex international criminal enterprise. Now that the money and gold are in the hands of the Government of Colombia, it also shows how vulnerable crime syndicates are becoming to global anti-money laundering measures, improved international cooperation, and better law enforcement operations. This success is due in significant part to years of training, technical assistance, and experience.

This case—like any criminal money laundering or terrorist financing seizure—should not, however, stop with the confiscation. Indeed, the confiscation itself should provide valuable intelligence and clues for identifying the individuals most responsible for this trade and enhancing the wherewithal of authorities to find, prosecute, convict, and incarcerate them. Establishing international anti-money laundering and counterterrorist financing norms and standards do much to impede these crimes, but making the masterminds of these operations pay with their freedom is a powerful deterrent for stopping them. The seizure of the money also takes away the primary motivation of these criminal groups—greed.

The Colombian National Police, in this instance, are believed to have made the largest cash seizure ever from a narcotics case. The seizure consisted of U.S.

currency, euros, and gold. The money belonged to one criminal organization and was seized at five different locations during one enforcement operation. The Colombian National Police carried out the raids with intelligence and some operational planning assistance from the U.S. Drug Enforcement Administration. Reportedly, no suspects were apprehended at the time of the raids, but several were known ahead of time, and several more have been identified as a result of intelligence gleaned from the seizure.

An \$80 million seizure attracts serious attention. In the hands of the Colombian traffickers, it represents the proceeds of criminal operations on a massive scale. It could reflect the wholesale proceeds of exporting more than five metric tons of cocaine to the United States or Europe. This much money in the hands of Asian or Latin America traffickers could also represent the profits from smuggling approximately 1,600 Chinese into the United States or 32,000 illegal aliens from Mexico or Central America across our southwestern border. The circulation of massive amounts of drug money on this scale can create huge, adverse distortions in a weak or small economy.

There is no social or economic "Robin Hood" effect when criminals are in possession of such sums. Their investments tend to be conspicuous, not productive. Moreover, dirty money crowds out legitimate economic activity, creates unfair competition for legitimate businesses, erodes good business practices and ethics, and interferes with the development of sound economic policies. It is almost a bottomless reservoir for corruption that can impede enforcement efforts from front line police officers, to swaying legislators, judges, regulators, or senior executives charged with writing, enforcing, and upholding laws in a rule of law society. \$80 million dollars in the hands of terrorists could have funded countless attacks in the United States and around the world. The 9/11 Commission reported that al-Qaida likely spent some \$400,000-\$500,000 to carry out its 2001 attacks on the United States. While the Colombian seizure is a record amount, it may not be uncharacteristic of similarly large amounts of crime profits lying about in criminal safe havens in the Middle East, Africa, South or Southeast Asia, or Europe.

Dollars, euros, and gold—the three instruments seized in this raid—constitute the face of modern day crime transactions and further highlight the complexity of the money laundering challenge. It suggests large-scale criminal proceeds in the U.S. and European markets, as well as nearly anywhere else in the world. In this respect, the seizure epitomizes the transnational nature of the trade and the dark side of globalization, where national boundaries are no barrier to criminal enterprises, and where most instruments to blur these boundaries—such as rapid and far reaching cyber communications or internationally-recognized currencies—work as much to the benefit of crime syndicates, by easing associations and transfers and providing rapid movement, as they do for legitimate enterprises. The seized gold is especially telling. Historically, the largest value money laundering investigations have involved gold. Gold is both a commodity and a de facto bearer instrument. The form of gold can be readily altered. There is a large cultural demand for gold in Colombian

society and elsewhere around the world. Moreover, gold is immune from traditional financial transparency reporting requirements.

The seizure also underscores a likely growing worldwide reluctance of syndicates to place their money in banks where it is increasingly likely to be detected—owing to the steadily improving scrutiny and tracking abilities of the formal financial system. Authorities discovered the dollars, euros, and gold in private residences and businesses, buried in the ground, stashed in private safes, or hidden elsewhere. For any law-abiding entity, this would be an extraordinarily risky way to safeguard and account for such sums. But this example shows how formal financial institutions have become such a significant threat to the operations of crime syndicates and terrorist financiers—that they are willing to take high risks to avoid them.

Since the G-7 created the Financial Action Task Force (FATF) nearly two decades ago in 1989, the international community has been working determinedly to develop the procedures and practices necessary to expose criminal proceeds and take them out of the hands of the syndicates. Since its original seven-country membership (the U.S., Canada, the UK, France, Germany, Italy, and Japan), FATF has grown to include 31 countries and two multilateral organizations (the European Commission and the Gulf Cooperation Council). Its "40 recommendations" to guard against money laundering and nine additional "special recommendations" on terrorist financing contain several provisions aimed specifically at identifying "suspicious transactions," the true owner of such transactions or abnormally large deposits, and tracking them through the system of banks and nonbank financial institutions—such as brokerage houses, money exchangers, or money service businesses. The provisions include "whistle-blower" type protection for tellers, bankers, and others who are on the front lines of receiving and detecting such deposits to help guard against corruption, intimidation, or retaliation.

FATF "recommendations" carry significant international clout. Both the 2001 UN Convention against Transnational Organized Crime and the 2005 UN Convention against Corruption contain extensive anti-money laundering provisions that are drawn from the FATF recommendations. In addition, recent UN Security Council Resolutions, which member states must abide by, have incorporated the FATF recommendations by direct reference. For instance, in July 2005, UN Security Resolution 1617 "strongly urges all Member States to implement the comprehensive international standards enacted in the FATF Forty recommendations and the Nine Special Recommendations on terrorist financing." This resolution further reinforces the commitment of the 169 members of FATF and the nine FATF—style regional bodies (FSRBs) to criminalize the financing of terrorism and enumerates actions that all UN Member States are legally bound to undertake by virtue of being a party to the UN International Convention for the Suppression of the Financing of Terrorism. It is against this background of growing international acceptance of these norms and standards, and hard work and investment by financial institutions and their compliance officers, that criminals and terrorist financiers, much like these Colombian traffickers, increasingly realize the growing risks they run of having their

large or suspicious transactions recorded by banks, shared with the police, and their criminal activities exposed.

A willingness to codify the FATF recommendations into laws and regulations means little if a country is unable, through lack of resources or skill, or unwilling, through lack of political commitment, to implement them. FATF has backed or imposed a wide-ranging set of measures to assist and motivate countries to adopt the "40+9" recommendations. This has included conducting mutual evaluations among its own members to assess their compliance with the recommendations and to suggest actions that remedy identified shortfalls. FATF, with bilateral assistance from the U.S. and other donors, has fostered the creation of FATF--style regional bodies around the world so jurisdictions that do not belong to FATF can join and form regionally-tailored organizations to accomplish FATF's objectives. Currently, 138 countries and territories belong to nine such organizations around the world. FATF-- and the cooperating donors--have sponsored seminars and provided training and technical experts to help start and sustain these FSRBs. They too have a major responsibility to conduct mutual evaluations among their members.

FATF has also acted in a united, multilateral front to deal with the most incorrigible states, and those whose weak anti-money laundering regimes or lack of international cooperation pose the most serious risk to anti-money laundering efforts. FATF works internally to identify those countries and will approach them to elicit improvements and better cooperation. If quiet diplomacy fails, FATF can--and has in 23 cases-- "named and shamed" noncooperating jurisdictions to focus international attention on them. When FATF identifies problematic countries, it expects its members to respond by invoking any number of counter measures. They range from issuing advisories that warn their financial institutions about the risks associated with dealing with such jurisdictions, to more drastic measures, such as those taken under Section 311 of the USA PATRIOT Act, to prohibit financial transactions with banks in these countries--or even with the countries themselves.

Many countries come into compliance with global norms and standards and avoid the risk of counter measures by passing the laws and writing the regulations called for in the FATF recommendations. The laws and regulations, however, need credible enforcement to be dissuasive and effective. This is a tough assignment for many countries, often requiring them to seek and/or accept training and technical assistance from foreign donors. U.S.-provided assistance in this regard can be valuable as the performance by the Colombian National Police in this \$80 million seizure attests. The U.S. has provided substantial anti-money laundering assistance to Colombia over the years, making our program there a model for what we are achieving in strategic countries elsewhere. With regard to the \$80 million seizure, the Colombian National Police, who have directly benefited from U.S. assistance, performed with initiative and professionalism. Indeed, aspects of the Colombia program are so strong that today Colombian anti-money laundering experts and officials are sought to provide advice, training, and assistance elsewhere in the region.

The State Department's anti-money laundering/counterterrorist financing training and technical assistance goal is to strengthen regional anti-money laundering organizations and build comprehensive anti-money laundering regimes, with no weak links, in strategic countries. We seek to maximize the institution-building benefits of our assistance by delivering it in both sequential and parallel steps. The steps, while tailored to each country's unique needs as determined by needs and threat assessments, include help in the following areas:

Drafting and enacting comprehensive anti-money laundering and terrorist financing laws that have measures to enable states to freeze and seize assets as well as comply with the FATF's "40+9" recommendations on money laundering and terrorist financing;

Establishing a regulatory regime to oversee the financial sector, including guarding against corruption and intimidation.

Training law enforcement agencies, prosecutors, and judges so that they have the skills to successfully investigate and prosecute financial crimes. Creating and equipping financial intelligence units (FIUs) so that they can collect, analyze, and disseminate suspicious transactions reports and other forms of financial intelligence to both help develop cases domestically and share information internationally through FIUs in other countries as part of transnational investigations.

The crowning achievements in money laundering cases, however, reach beyond the asset seizures and forfeitures. Authorities can, and must, glean from pre-and post-raid intelligence strong evidence to indict the financial and operational masterminds and foot soldiers behind these operations. The international community is underachieving on this front. Despite nearly unanimous compliance with the FATF recommendation to criminalize money laundering, and acceptance of various UN conventions and Security Council resolutions that make this mandatory, few criminals are being prosecuted or convicted for money laundering. The United Arab Emirates, where the threats of money laundering and terrorist finance are particularly acute, is one example of many strategic countries that are on the right track, but still need to get over this hurdle. The UAE has worked hard, particularly since 9/11, to establish anti-money laundering and counterterrorist finance regimes and counter measures that adhere to current world standards, yet it is still working to achieve its first money laundering or terrorist financing conviction. The UAE is not alone in this regard as a review of this year's INCSR country reports reveals a similar, unfortunate lack of implementation and enforcement around the world, including even in a number of the most advanced and developed economies on six continents.

The Colombia seizure highlights other key anti-money laundering challenges ahead: the use of cash couriers and trade based money laundering. The cash courier threat is also linked with the misuse of charities to finance terrorism. FATF, for instance,

has issued special recommendations and published associated interpretive notes and best practices to address the misuse of charities for terrorist financing. Some charities have been designated under various UN Security Council Resolutions for their roles in financing terrorism resulting in having their assets frozen and/or financial transactions with them prohibited. As this terrorist financing avenue has become more constricted and risky, terrorists have had to rely increasingly on cash couriers for their funds. FATF has a special recommendation, interpretive notes, and best practices papers to help countries address this threat also. Meanwhile, the United States has developed a course focused specifically on cash couriers, including how to find and stop them at borders, and inserted it as a feature in our anti-money laundering/counterterrorist training and technical assistance program.

The Department of State, in collaboration with the Departments of Homeland Security (DHS) and Treasury, began making combating trade-based money laundering a key part of its anti-money laundering effort several years ago. Since then, others have picked up on this urgency, including FATF which last year issued a special paper on trade-based money laundering. Trade is the common denominator in many entrenched underground or alternative remittance systems such as hawala, the black market peso exchange, the misuse of the international gold and gem trades, and other value transfer systems. To help address these vulnerabilities, the State Department's Bureau of International Narcotics and Law Enforcement Affairs (INL) began providing funding to the Department of Homeland Security in 2005 to establish prototype Trade Transparency Units (TTUs) in the Triborder Area countries of Argentina, Paraguay, and Brazil.

TTUs examine anomalies in trade data that could be indicative of customs fraud and trade-based money laundering. As a result of the 2005 INL/DHS initiative, DHS Immigration and Customs Enforcement (ICE) agents teamed with Brazilian authorities in 2006 to target a scheme involving the under-valuation of U.S. exports to Brazil to evade more than \$200 million in Brazilian customs duties over the past five years. The scheme involved tax evasion, document fraud, public corruption and other illegal activities in Brazil and the United States. In an excellent example of the long reach of law enforcement, more than 128 arrest warrants and numerous search warrants were simultaneously served in 238 locations in Brazil.

The State Department is working with DHS to expand the TTU concept to Southeast Asia. An international TTU network may eventually develop that will promote trade-transparency, combat customs fraud, and be the back door to entrenched informal underground value transfer systems.

Despite the increased awareness and significant progress that has been made on several fronts, much remains to be done in the global effort to combat money laundering. It will remain important to sustain and strengthen these gains because focusing on money laundering is one of the most valuable tools law enforcement has to combat international crime. A focus on money laundering can accomplish what many other law enforcement tools cannot: it can be applied equally effectively to a

wide variety of crimes, to any crime that must be financed or is committed for profit. Once in place, anti-money laundering measures can be used without any special tailoring to attack such threats as narcotics trafficking, alien smuggling, intellectual property theft, corruption, terrorism, and more.

Money laundering investigations also take advantage of one of the most important vulnerabilities of sophisticated criminal or terrorist organizations: their risk of exposure. Terrorism and much of organized crime thrive because they take place in the shadows of open society. As long as criminality remains in the underground of aliases, coded messages, false documents, bearer instruments, and clandestine operations, it is often undetectable to even seasoned investigators. When criminal activity breaches this underground, it often provides leads and evidence authorities can use to unravel these cases. The challenge of coping with especially large amounts of money inevitably generates pressure on criminal organizations to take placement, layering, and integration actions involving record keeping, meetings, or other events that eventually surface and expose them for identification and tracking. Full exploitation of these vital breakthroughs can lead investigators, armed with incriminating financial intelligence and evidence, to the financiers and managers of these organizations-to the heart of the syndicates. This is happening in Colombia, as the \$80 million seizure demonstrates. But getting to this desirable outcome in many countries around the world still requires a great deal of training, equipping, and political will.

Money Laundering/Asset Forfeiture

During 2006, the Justice Department's OPDAT and AFMLS continued to provide training to foreign prosecutors, judges and law enforcement, and assistance in drafting anti-money laundering statutes compliant with international standards. The assistance provided by OPDAT and AFMLS enhances the ability of participating countries to prevent, detect, investigate, and prosecute money laundering, and to make appropriate and effective use of asset forfeiture. The content of individual technical assistance varies depending on the specific needs of the participants, but topics addressed in 2006 included developments in money laundering legislation and investigations, complying with international standards for anti-money laundering/counterterrorist financing regimes, illustrations of the methods and techniques to effectively investigate and prosecute money laundering, inter-agency cooperation and communication, criminal and civil forfeiture systems, the importance of international cooperation, and the role of prosecutors.

AFMLS provides technical assistance directly in connection with legislative drafting on all matters involving money laundering, asset forfeiture and the financing of terrorism. During 2006, AFMLS provided such assistance to 16 countries and actively participated in the drafting of the forfeiture provisions for the OAS/CICAD Model Regulations. AFMLS continues to participate in the UN Working Group to draft a model nonconviction based asset forfeiture law and the G-8 working groups on corruption and asset sharing and the CARIN Group on asset recovery.

AFMLS provided training to government officials concerned with money laundering and asset forfeiture issues in Azerbaijan, Andorra; Bangladesh, Brazil; Bulgaria; Estonia; Kosovo, Macedonia, Peru, the Republic of Korea, Sri Lanka, and Turkey. These officials attended in-depth sessions on money laundering and international asset forfeiture. Additionally, in 2006, AFMLS provided technical assistance to Afghanistan, Albania, Bangladesh, Brazil, Bulgaria, Pakistan, Indonesia, Iraq, Kenya, Kosovo, Malawi; Sri Lanka, the Republic of Korea, Tanzania, Thailand, and Turkey.

In an effort to improve international cooperation, AFMLS, in conjunction with the Italian Ministry of Justice, co-hosted a conference in Rome, Italy, April 4-6, 2006, on International Forfeiture Cooperation for prosecutors and investigators to discuss "What Works? What doesn't and Why?" Practitioners and other experienced government officials from Austria, Brazil, Canada, Denmark, Estonia, France, Guernsey, Hong Kong, Isle of Man, Ireland, Israel, Luxembourg, the Netherlands, South Africa, Sweden, United Kingdom and the United States participated. This conference brought practitioners and international experts, including representatives from Egmont, Eurojust and the private sector, together to share experiences and ideas to provide practical tools to further international cooperation in forfeiture.

With the assistance of Department of State funding, in 2006 OPDAT provided training to government officials on money laundering and financial crime related issues in more than eleven countries, including Romania, Slovenia, Nigeria, South Africa, Suriname, Malawi, Azerbaijan, and Albania. OPDAT RLAs in these countries organized in-country seminars on money laundering, asset forfeiture, terrorist financing and financial crime investigations and prosecutions.

In February 2006, OPDAT conducted a three-day conference on financial crimes, asset forfeiture and money laundering in Abuja, Nigeria, for approximately 50 Nigerian prosecutors and police. Topics included money laundering, asset forfeiture, financial investigations, prosecuting complex financial cases, and offshore banking and electronic funds transfer systems.

In February and March 2006, OPDAT organized a series of three anti-money laundering/counter terrorist financing workshops conducted by AFMLS in Ankara, Antalya, and Istanbul, Turkey, for approximately 100 Turkish prosecutors and investigators. The workshops focused on providing an interactive platform for participants to examine the tools (legislative, investigative, prosecutorial) available in financial crime cases.

In April 2006, OPDAT RLA to Bosnia and Herzegovina organized two financial crimes training seminars in Sarajevo, Bosnia and Herzegovina. Each of the two-day sessions included an in depth examination of current issues regarding financial and transnational crimes. The seminars explored various investigative techniques

(money laundering detection, asset forfeiture) and the roles of different agencies (prosecutors, finance police, financial intelligence units, and bank regulators).

In May 2006, OPDAT conducted an intensive three-day workshop in Paramaribo, Suriname, on best practices for financial investigations and prosecutions. The OPDAT training team, consisting of a U.S. federal prosecutor and an FBI special agent, presented the course to an audience of Surinamese prosecutors, investigators, and a legislative expert.

In July 2006, OPDAT deployed its new RLA to Azerbaijan. The RLA placed renewed emphasis on establishing a legal framework in Azerbaijan to investigate and prosecute money laundering, terrorist financing and financial crimes, including pushing for the passage of the draft AML/CFT law and the creation of a financial intelligence unit (FIU). Passage of a comprehensive AML/CFT (Anti-Money Laundering/Counter-Financing Terrorism) law and the development of an FIU that complies with international standards are significant USG priorities for Azerbaijan. OPDAT and AFMLS have provided detailed technical assistance on the draft AML/CFT law for the last year, but the draft appeared stalled. In late 2006, the RLA identified several specific obstacles to passage of this law and strategies to overcome them, with the goal of seeing the AML/CFT law passed by the end of the first quarter of 2007. These steps included engaging the government of Azerbaijan (GOAJ) at multiple levels, and creating opportunities to substantively assist the GOAJ in areas that were holding up the passage of the law. In furtherance of this strategy, the RLA took a delegation of Azerbaijani officials to an anti-money laundering conference sponsored by the SECI Center held in Moldova in September 2006. This conference impressed the Azerbaijani delegation with the progress being made by many other countries in the region and stressed the need to move forward with their own legislation in a timely manner. The RLA also coordinated with the President's Office and the Council of Europe to organize a comprehensive conference on the creation of a FIU in Azerbaijan--an issue that is significantly delaying the passage of the AML/CFT. In October 2006, the OPDAT RLA, in collaboration with AFMLS, organized the aforementioned FIU conference in Baku, Azerbaijan, for an audience of over 50 participants from a dozen different ministries and agencies, including the National Bank, the Prosecutors Office and the President's Office.

In July 2006, OPDAT RLA to South Africa coordinated a training session with participation by AFMLS for all the members of the South African Asset Forfeiture Unit (AFU). In August 2006, the RLA also arranged for three financial investigators from the AFU to attend a U.S.-based financial investigation training in New York City provided by AFMLS. All reports point to the fact that the training was substantive and very relevant to the work of an AFU investigator. These three talented investigators are now positioned as resources on financial investigation techniques for the rest of the AFU investigators and the core financial investigation competency of the AFU has increased. Of particular note during this period was the OPDAT conference on organized crime (August 28-September 1) that was attended by the National

Prosecution Service and the Scorpions. For the first time and at the direction of the OPDAT RLA, attorneys from the AFU helped plan the conference and participated in the program. As a result, the conference educated South African prosecutors on the importance of prosecution components (National Prosecution Service and the Scorpions) calling upon the expertise and involvement of the AFU in the early stages of important investigations. This will help meet the AFU goal of increasing the amount of illicit proceeds that are recovered by the AFU in conjunction with significant criminal prosecutions. According to the Chief of the Pretoria Division of the AFU, the OPDAT program finally made the AFU a full law enforcement partner.

As part of Plan Colombia, in 2006, OPDAT continued to provide assistance to enhance the capability of Colombia's National Asset Forfeiture and Money Laundering Task Force to investigate and prosecute money laundering and other complex financial crimes, and to execute the forfeiture of profits from illegal narcotics trafficking and other crimes. These efforts are complemented by a comprehensive long-range program to assist the country's judges, prosecutors and investigators in making the transition from the inquisitorial to the accusatory system.

In October-November 2006, OPDAT in cooperation with the Federal Bureau of Investigation organized a week-long anti-money laundering U.S.-based study tour in Washington, DC, for a 15-person, senior-level Malaysian delegation headed by the Solicitor General of Malaysia and the Inspector General of the Royal Malaysia Police. The delegation consisted of officials from the Attorney General's Chambers, Royal Malaysia Police, Anti-Corruption Agency, Central Bank of Malaysia, Ministry of Finance, as well as representatives from other law enforcement and legal agencies. The program focused on the legal aspects surrounding money laundering investigations and prosecutions, as well as asset forfeiture and the management and disposal of forfeited properties.

Organized Crime

During 2006, OPDAT organized a number of programs for foreign officials on transnational or organized crime, which included such topics as corruption, money laundering, implementing complex financial investigations and special investigative techniques within a task force environment, international standards, legislation, mutual legal assistance, and effective investigation techniques.

OPDAT RLAs continued to support Bosnia's Organized Crime Anti-Human Trafficking Strike Force and the Strike Force's working relationship with officials in Albania, Bulgaria, Kosovo, Macedonia, Montenegro, and Serbia-through mentoring and training programs on investigating and developing organized crime case strategies.

In February 2006, OPDAT RLA to Albania organized training for 40 prosecutors on the organized crime amendments to the Albanian Criminal Procedure Code. This training was part of a series of trainings for all 250 prosecutors in the nation,

addressing the host of new anti-organized crime laws and Code amendments that were enacted in 2004.

Also in February 2006, OPDAT conducted a three-day conference on investigating and prosecuting terrorism and other organized crimes in Manila, Philippines. The program focused on familiarizing 22 Filipino judges, prosecutors, and investigators with methods of combating transnational organized crime and terrorism offenses, including effective investigative and prosecutorial techniques.

In March 2006, an OPDAT RLA to Macedonia organized a two-week U.S.-based study tour program on combating organized crime for a ten-member delegation from Macedonia, which consisted of seven prosecutors and three judges. The program focused on familiarizing the Macedonians with collecting evidence and building organized crime cases, especially in cases relating to trafficking in persons, corruption, narcotics, financial crime and money laundering, as well as related asset forfeiture.

In June 2006, OPDAT conducted a week-long program on combating prosecuting organized crime in Hanoi, Vietnam, for an audience of 35 Vietnamese judges, prosecutors and investigators. The program focused on the methods of combating transnational organized crime, including effective investigative and prosecutorial techniques.

In July 2006, OPDAT's RLA to Serbia organized a three-day seminar for 30 Serbian prosecutors and police officials focused on the task force approach to combating organized crime and corruption.

In September 2006, OPDAT deployed an Intermittent Legal Advisor (ILA) to Pretoria, South Africa, for a three-month assignment that focuses on assisting the South African prosecution authority in its efforts to combat organized crime. The same ILA has already completed several previous three to six-month tours of duty in South Africa. Throughout these tours of duty, the ILA developed and began implementing several iterations of a training program for prosecutors on combating organized crime and racketeering. The ILA has already trained nearly 500 prosecutors at several sessions all over the country. In addition, the ILA is meeting with prosecutors and investigators throughout the country and conducting case audits. During this process the potential use of the South African racketeering statute is discussed. The statute is the South African equivalent of the U.S. RICO statute that has been so effective in combating organized crime in the U.S. As a result of these consultations the prosecutorial use of the racketeering statute in charging crimes has increased dramatically. Much of this increase can be attributed directly to the ILA's work in South Africa.

Fraud/Anticorruption

In 2005, OPDAT placed two RLAs overseas in Indonesia and Nicaragua to provide technical assistance on a long-term basis specifically on corruption cases. In 2006, both RLAs continued to provide technical assistance on anticorruption matters for prosecutors and investigators to improve their investigative and prosecutorial abilities to combat public corruption. In Nicaragua, OPDAT RLA supported the creation of a vetted Anti-Corruption and Money Laundering Unit ("Task Force") that consists of members of the Nicaraguan National Police and the Attorney General's Office who are tasked with investigating money laundering and other corruption-related crimes. The RLA is helping train the Nicaraguan anticorruption specialists, making the Task Force a cornerstone in the U.S.-Nicaragua cooperation in the fight against corruption. The RLA is providing technical assistance and training to the Task Force and serves as a conduit of information between the unit and U.S. law enforcement agencies.

In May 2006, OPDAT in collaboration with AFMLS and the General Secretariat of the Organization of American States (OAS), held a seminar on the recovery of the proceeds of the acts of corruption in Miami, Florida. The workshop was in line with the G-8 and Summit of the Americas commitments to deny safe haven and assets to those who are corrupt and to those who corrupt them.

Also in May 2006, the OPDAT RLA to Indonesia organized a one-day workshop on investigating and prosecuting corruption cases in Bogor, Indonesia. The assembled 59 participants included police investigators, prosecutors, and auditors from the state auditing agency. The one-day workshop focused on familiarizing the participants with investigative and prosecutorial strategies for public corruption cases, which are not commonly used in Indonesia.

In May-June 2006, the OPDAT RLA to Bosnia and Herzegovina sponsored a three-day seminar on tax fraud cases for prosecutors and tax administrators in Sarajevo, Bosnia & Herzegovina. The 60 participants in the program included prosecutors and tax administrators from the various districts and regions of the country. The seminar taught the participants the basics of investigating and prosecuting tax fraud cases. In addition, it promoted cooperation and communication between the two groups.

Terrorism/Terrorist Financing

Since 2001 OPDAT, the DOJ's Counterterrorism Section (CTS), and AFMLS have intensified their efforts to assist countries in developing their legal infrastructure to combat terrorism and terrorist financing. OPDAT, CTS, and AFMLS, with the assistance of other Department of Justice (DOJ) components, play a central role in providing technical assistance to foreign counterparts both to attack the financial underpinnings of terrorism and to build legal infrastructures to combat it. In this effort, OPDAT, CTS, and AFMLS work as integral parts of the U.S. Interagency

Terrorist Financing Working Group (TFWG) in partnership with the Departments of State, Treasury, Homeland Security's ICE, and several other DOJ components.

OPDAT currently has seven RLAs assigned overseas who are supported by the interagency Terrorist Financing Working Group (TFWG), co-chaired by State INL and S/CT. The RLAs are located in Bangladesh, Indonesia, Kenya, Pakistan, Paraguay, Turkey, and the United Arab Emirates. Working in countries where governments are vulnerable to or may even be complicit in terrorist financing, these RLAs focus on money laundering and financial crimes and developing counterterrorism legislation that criminalizes terrorist acts, terrorist financing, and the provision of material support or resources to terrorist organizations. The RLAs also develop technical assistance programs for prosecutors, judges and, in collaboration with DOJ's International Criminal Investigative Training Assistance Program (ICITAP), police investigators, to assist in the implementation of new anti-money laundering and counterterrorist financing procedures.

In August 2003, OPDAT dispatched its first counterterrorism RLA to Asuncion, Paraguay, part of the Tri-Border area (with Brazil and Argentina) where the rather porous borders facilitate money laundering and bulk cash smuggling. The second counterterrorism RLA arrived in Nairobi, Kenya, in December 2004, to assist with terrorism legislation, training in complex financial crimes and, in general, to bolster the capacity of the prosecutor's office. Both RLAs have conducted significant legislative reform and/or training programs during their tenure. The Paraguay RLA in 2006 continued his focus on needed reforms to the Paraguayan Criminal Procedure Code, providing counsel and technical assistance to the legislative commission assigned with the task of reform.

In January 2006, OPDAT organized a trial advocacy course in Nairobi, Kenya, following the successful trial advocacy training provided by the OPDAT RLA in August 2005. In addition to U.S. prosecutors, U.S. judges and FBI agents, presenters included two prosecutorial trainers from the U.K. Crown Prosecution Service who provided a British perspective on Kenyan legal practice. After the first OPDAT RLA to Kenya departed Nairobi in November 2005, OPDAT sent out its second RLA to Kenya in May 2006. During his first few months in country, the RLA met with all the regional offices of the Department of Public Prosecutions, setting the stage for a country-wide prosecutorial training program. The RLA also monitored the progress of the pending Kenyan counterterrorism legislation, offering DOJ expertise in guiding the development of the counterterrorism strategy for Kenya and the region as needed.

In July 2006, OPDAT sent a new counterterrorism RLA to the United Arab Emirates (UAE) to work on financial crimes, terrorist financing, and money laundering issues. The RLA immediately engaged local officials responsible for money laundering and terror finance issues. The RLA held meetings with the Anti-Money Laundering and Financial Crimes Unit (AMLFCU) of the Dubai Police Department, Criminal Investigation Division, to discuss future training and collaboration. OPDAT expanded

the UAE RLA portfolio to include assistance to other states in the Gulf Region in combating money laundering and terrorist financing. In September 2006, the RLA traveled to Kuwait and Jordan to meet with the key players in the Anti-Money Laundering/Terrorist Financing (AML/TF) field in the Kuwaiti and Jordanian governments. In November 2006, the RLA again traveled to Kuwait to discuss the possibility of providing training that would strengthen the Kuwaiti FIU and the capacity of Kuwaiti prosecutors and judges to combat financial crimes. As a result, the RLA is currently in the process of planning AML/CTF trainings in both Kuwait and Jordan, set to take place in early 2007.

In December 2006, OPDAT's RLA to the UAE also engaged with Saudi Arabian officials. The RLA was a member of the U.S. delegation to the U.S.-Saudi Arabia Strategic Dialogue Working Group sessions that took place December 3-5, 2006, in Riyadh. These consultations were focused on a bilateral exchange of ideas regarding possible future technical assistance programs involving the Saudi justice sector. The results were positive and future programs in Saudi Arabia on money laundering/counter terrorism financing (including perhaps charities regulation) are anticipated.

In March 2005, OPDAT placed its first RLA in South Asia at Embassy Dhaka with the goal of assisting the Government of Bangladesh in strengthening its anti-money laundering/terrorist financing regime, and improving the capability of Bangladeshi law enforcement to investigate and prosecute complex financial and organized crimes. During 2006, the RLA continued to provide assistance to Bangladeshi officials in their efforts to establish an effective anti-money laundering and terrorist financing regime. Specifically, the RLA continued her work on forming a financial crimes task force and a Financial Intelligence Unit (FIU) to be housed in the central bank. The RLA achieved a major step forward on task force development when she facilitated the signing, by five relevant government agencies, of an inter-agency agreement promoting the creation of a task force for money laundering and terrorist financing cases. The signing came at the end of a two day retreat organized in September for just this purpose, bringing together the key figures at each relevant agency. The group consisted of the Bank of Bangladesh (the central bank), the Attorney General's Office, the Finance Ministry (the tax authority), Criminal Investigation Division CID), and the Home Affairs Ministry. The agreement sets forth the process by which anti-money laundering cases initiated by the central bank will be investigated and prepared for trial. Among the critically important agreed upon provisos: CID will designate 6 officers to work anti-money laundering/terrorist financing (AML/TF) cases and will also work with prosecutors throughout the investigation. The September retreat represented the culmination of six months of work by the RLA.

In October 2006, the Bangladeshi Law Minister (the country's lead prosecutor) designated four attorneys to handle money laundering and terrorist financing cases on the task force. The first money laundering investigations by the task force commenced in November, based on Bank of Bangladesh referrals to the CID of

suspicious transaction reports. Training for the task force members continued throughout the quarter and into the second quarter of FY2007. In November, the RLA worked with a team from the IRS to provide two weeks of interactive training for officials from four agencies on accounting methods used to detect money laundering. In December, the prosecutors dedicated to the task force participated in a workshop with DOJ Asset Forfeiture and Money Laundering Section (AFMLS) Deputy Chief Linda Samuel; particular emphasis was given to working with these prosecutors on how to anticipate defense arguments in pre-trial and trial proceedings and prepare counter arguments.

OPDAT placed its first RLA in Indonesia in June 2005. In 2006, the RLA continued his work in providing assistance to the Indonesian Counter Terrorism Task Force (CTTF) to augment their advanced criminal procedures, criminal laws, and prosecutor skills to prepare and try complex terrorism and other organized crime cases. He also assisted the general prosecutors with skill-building and integrity development to ultimately enlarge the cadre of counterterrorism prosecutors. The RLA provided legislative drafting assistance and skills development seminars, and invited experts from other components of DOJ to demonstrate techniques for effective mutual legal assistance. Upon the departure of the first RLA in June 2006, OPDAT deployed its second Indonesia RLA to Jakarta in July 2006. The new RLA helped establish the Attorney General's Terrorism and Transnational Crime Task Force as an operational unit. He negotiated and arranged for the procurement and delivery approximately \$80,000 in office supplies and computers to the Task Force. As a result, the Task Force is now actively supervising cases against 21 defendants. The RLA also spoke at a regional counterterrorism conference in Makassar, Indonesia, on police/prosecutor cooperation--a major obstacle in Indonesia.

In September 2006, OPDAT deployed its first-ever RLA to Ankara, Turkey, with the goal of assisting Turkey to amend and implement effective money laundering legislation, and other related and potentially affected criminal statutes, codes, laws and regulations. In the same month, OPDAT also deployed its first ever RLA to Pakistan. The RLA spent his first month in country appraising the capacity of Pakistan's criminal justice system to function effectively. Since then, the Ambassador asked the RLA to place a heavy emphasis on laying the foundation with Pakistani prosecutors and investigators for future trainings on financial crimes.

In addition to the programs organized by the seven counterterrorism RLAs, in 2006 OPDAT conducted both bilateral and regional counterterrorism training programs. In June-July 2006, OPDAT RLA to Bosnia and Herzegovina conducted a nine-day study tour to the United States for thirteen members of the Counter-Terrorism Task Force (CTTF) of Bosnia and Herzegovina. The program introduced the delegation to the working procedures of U.S. inter-agency task forces, thereby promoting cooperation and information sharing between and among Bosnian prosecutors and police agencies.

In April 2006, OPDAT conducted a South Asia regional seminar in Colombo, Sri Lanka, on safeguarding charities from abuse. Law enforcement officers, prosecutors, and financial sector officials from Sri Lanka, Afghanistan, Bangladesh, the Maldives, and Pakistan participated in the event. The conference stressed the importance of mutual cooperation in preventing the ability of terrorists to generate and disperse terrorist funds.

Justice Sector Reform

In 2006 DOJ's Justice Sector Reform Program in Colombia focused on four specific areas: (1) continued assistance in implementation of accusatory system, (2) assistance in specialized areas of criminal law, (3) implementation of justice and peace law, and (4) security and protection programs. In 2006, DOJ trained over 1,000 prosecutors; 6,000 police; 300 judges; and 100 forensic scientists in the accusatory system and implementation of the new Colombian Criminal Procedure Code, most of who will be implementing the new Code in their respective judicial districts in 2007 as part of the gradual, region by region implementation of the new law. This training involved intensive, practical training in the concepts and legal underpinnings of an accusatory system and the new Code, as well as the technical skills and practical application necessary for implementation—crime scene management, forensic development and presentation of forensic evidence, witness interview, trial preparation, chain of custody and presentation of evidence at trial, trial techniques, investigation and prosecution strategy, police/prosecutor cooperation. DOJ also provided equipment to facilitate the implementation of the new Code. DOJ's assistance in specialized areas of criminal law included training for prosecutors, investigators, and forensic scientists in money laundering, antiskidnapping, sex crimes, anticorruption, forensic anthropology, intellectual property, and human rights. DOJ also provided equipment and operational funds to specialized units within the Prosecutor General's Office. DOJ initiated training and technical assistance as well as providing equipment, office and court facilities development, and operational funds for the Prosecutor General's Justice and Peace Unit tasked with the investigation, interviewing and prosecution of demobilized paramilitary members under the Justice and Peace law. DOJ also provided similar assistance to the Colombian magistrates who will be involved in the court proceedings under this law. In the area of protection, DOJ continued to provide judicial protection training to Colombian protection details and began a shift in this protection training and assistance to courtroom and courthouse security. Over 200 protection personnel were trained in 2006. In addition, DOJ placed a U.S. Marshals Service (USMS) official in the Embassy in Bogota to assist the Colombian Prosecutor General's Office to develop a viable witness protection program. The goal is to train over 100 protection personnel as well as to enhance the structure for a protection program.

OPDAT currently has eight Resident Legal Advisors (RLAs) in Iraq assisting the Iraqi justice sector in enhancing sustainable institutions built on rule of law principles, with plans to expand the program in the near future. Presently, two RLAs are stationed at

the Embassy in Baghdad and six RLAs are deployed as Rule of Law Coordinators to Provincial Reconstruction Teams (PRTs) in Iraqi provinces, one each in Ninewa (Mosul), Tamim (Kirkuk), Babil (Hillah), Salah ad Din (Tikrit), and Baghdad. As members of the interdisciplinary reconstruction effort, OPDAT RLAs work with local police and judges to identify and overcome obstacles to effective, fair prosecutions. The RLAs stationed at the Embassy in Baghdad advise the Multi-National Corps-Iraq, the U.S. Embassy, the Central Criminal Court of Iraq, the Iraq Ministry of Justice, and the Iraqi Higher Juridical Council on criminal justice, rule of law, and judicial capacity building.

Program (PALP)—a four-year program designed to develop viable anti-money laundering/ counterterrorist finance regimes in the fourteen non-FATF member states of the PIF. Full-time and intermittent residential mentors provide regional and bilateral training in all elements required to establish viable anti-money laundering/counterterrorist financing regimes that comport with international standards. PALP is committed to maximizing the institution-building benefits of its assistance by delivering it in both sequential and parallel steps. The steps, while tailored to each country's unique needs, include assistance in the following areas:

- Drafting and enacting comprehensive anti-money laundering and counterterrorist financing laws that have measures that enable states to freeze and seize assets and comply with the FATF's "40+9" recommendations on money laundering and terrorist financing;
- Establishing a regulatory regime to oversee compliance of the formal and informal financial sectors with international standards;
- Creating, equipping, and enhancing existing FIUs so that they can collect, analyze, collate, and disseminate suspicious transactions reports and other forms of financial intelligence to both help develop cases domestically and share information internationally through FIUs in other countries as part of transnational investigations; and
- Training law enforcement agents, prosecutors, and judges so that they have the skills to successfully investigate and prosecute financial crimes including the financing of terrorism.

United Nations Global Program Against Money Laundering

The United Nations is one of the most experienced global providers of anti-money laundering (AML) training and technical assistance and, since 9-11, counterterrorist financing, training, and technical assistance. The United Nations Global Programme against Money Laundering (GPML), part of the United Nations Office on Drugs and Crime (UNODC), was established in 1997 to assist Member States to comply with the UN Conventions and other instruments that deal with money laundering and terrorist financing. These now include the United Nations Convention against Trafficking in Narcotics and Psychotropic Substances (the Vienna Convention), the United Nations International Convention for the Suppression of the Financing of Terrorism, the United Nations Convention against Transnational Organized Crime (the Palermo Convention), and the United Nations Convention against Corruption

(the Merida Convention). On September 2006, the UN General Assembly adopted the United Nations Global Counter-Terrorism Strategy. The Plan of Action contained in the Strategy encourages the UNODC to help countries comply with international norms and standards and to enhance international cooperation in these areas. The GPML is the focal point for anti-money laundering within the UN system and a key player in strengthening efforts to counter the financing of terrorism efforts. The Programme provides technical assistance and training in the development of related legislation, infrastructure and skills, directly assisting Member States in the detection, seizure and confiscation of illicit proceeds. Since 2001, GPML's technical assistance work on countering the financing of terrorism has in fact also received priority. The GPML now incorporates a focus on counterterrorist financing (CTF) in all its technical assistance work. In 2006, the GPML provided training and long-term assistance in the development of viable anti-money laundering/counterterrorism regimes to more than fifty countries.

The GPML administers the Anti-Money Laundering International Database (AMLID) on the International Money Laundering Information Network (IMoLIN), an online, password-restricted analytical database of national AML/CFT legislation that is available only to public officials. The GPML also maintains an online AML/CTF legal library. IMoLIN (www.imolin.org) is a practical tool in daily use by government officials, law enforcement and lawyers. The Programme manages and constantly updates this database on behalf of the UN and ten major international partners in the field of anti-money laundering/countering the financing of terrorism: the Asia/Pacific Group on Money Laundering (APG), the Caribbean Financial Action Task Force (CFATF), the Commonwealth Secretariat, the Council of Europe-MONEYVAL- the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), the Eurasian Group (EAG), the Financial Action Task Force (FATF), Interpol, The Financial Action Task Force of South America (GAFISUD) and the Organization of American States (OAS). In February 2006, the GPML launched the second round of legal analysis utilizing the recently revised AMLID questionnaire. In this regard, the database currently reflects thirty-six revised questionnaires under the second round of legal analysis and an additional fifteen questionnaires are in various stages of being finalized. The updated AMLID questionnaire reflects new money laundering trends and standards, and takes provisions related to terrorist financing and other new developments in to account, including the revised FATF recommendations.

Major Money Laundering Countries

Every year, U.S. officials from agencies with anti-money laundering responsibilities meet to assess the money laundering situations in 200 jurisdictions. The review includes an assessment of the significance of financial transactions in the country's financial institutions that involve proceeds of serious crime, steps taken or not taken to address financial crime and money laundering, each jurisdiction's vulnerability to money laundering, the conformance of its laws and policies to international standards, the effectiveness with which the government has acted, and the government's political will to take needed actions.

The 2007 INCSR assigned priorities to jurisdictions using a classification system consisting of three differential categories titled Jurisdictions of Primary Concern, Jurisdictions of Concern, and Other Jurisdictions Monitored.

The “Jurisdictions of Primary Concern” are those jurisdictions that are identified pursuant to the INCSR reporting requirements as “major money laundering countries.” A major money laundering country is defined by statute as one “whose financial institutions engage in currency transactions involving significant amounts of proceeds from international narcotics trafficking.” However, the complex nature of money laundering transactions today makes it difficult in many cases to distinguish the proceeds of narcotics trafficking from the proceeds of other serious crime. Moreover, financial institutions engaging in transactions involving significant amounts of proceeds of other serious crime are vulnerable to narcotics-related money laundering. The category “Jurisdiction of Primary Concern” recognizes this relationship by including all countries and other jurisdictions whose financial institutions engage in transactions involving significant amounts of proceeds from all serious crime. Thus, the focus of analysis in considering whether a country or jurisdiction should be included in this category is on the significance of the amount of proceeds laundered, not of the anti-money laundering measures taken. This is a different approach taken than that of the FATF Non-Cooperative Countries and Territories (NCCT) exercise, which focuses on a jurisdiction’s compliance with stated criteria regarding its legal and regulatory framework, international cooperation, and resource allocations.

All other countries and jurisdictions evaluated in the INCSR are separated into the two remaining groups, “Jurisdictions of Concern” and “Other Jurisdictions Monitored,” on the basis of a number of factors that may include: (1) whether the country’s financial institutions engage in transactions involving significant amounts of proceeds from serious crime; (2) the extent to which the jurisdiction is or remains vulnerable to money laundering, notwithstanding its money laundering countermeasures, if any (an illustrative list of factors that may indicate vulnerability is provided below); (3) the nature and extent of the money laundering situation in each jurisdiction (for example, whether it involves drugs or other contraband); (4) the ways in which the United States regards the situation as having international ramifications; (5) the situation’s impact on U.S. interests; (6) whether the jurisdiction has taken appropriate legislative actions to address specific problems; (7) whether there is a lack of licensing and oversight of offshore financial centers and businesses; (8) whether the jurisdiction’s laws are being effectively implemented; and (9) where U.S. interests are involved, the degree of cooperation between the foreign government and U.S. government agencies. Additionally, given concerns about the increasing interrelationship between inadequate money laundering legislation and terrorist financing, terrorist financing is an additional factor considered in making a determination as to whether a country should be considered an “Other Jurisdiction Monitored” or a “Jurisdiction of Concern”. A government (e.g., the United States or the United Kingdom) can have comprehensive anti-money laundering laws on its

books and conduct aggressive anti-money laundering enforcement efforts but still be classified a “Primary Concern” jurisdiction. In some cases, this classification may simply or largely be a function of the size of the jurisdiction’s economy. In such jurisdictions quick, continuous and effective anti-money laundering efforts by the government are critical. While the actual money laundering problem in jurisdictions classified “Concern” is not as acute, they too must undertake efforts to develop or enhance their anti-money laundering regimes. Finally, while jurisdictions in the “Other” category do not pose an immediate concern, it will nevertheless be important to monitor their money laundering situations because, under certain circumstances, virtually any jurisdiction of any size can develop into a significant money laundering center.

Vulnerability Factors

The current ability of money launderers to penetrate virtually any financial system makes every jurisdiction a potential money laundering center. There is no precise measure of vulnerability for any financial system, and not every vulnerable financial system will, in fact, be host to large volumes of laundered proceeds, but a checklist of what drug money managers reportedly look for provides a basic guide. The checklist includes:

- Failure to criminalize money laundering for all serious crimes, or limiting the offense to narrow predicates.
- Rigid bank secrecy rules that obstruct law enforcement investigations or that prohibit or inhibit large value and/or suspicious or unusual transaction reporting by both banks and nonbank financial institutions.
- Lack of or inadequate “know-your-client” requirements to open accounts or conduct financial transactions, including the permitted use of anonymous, nominee, numbered or trustee accounts.
- No requirement to disclose the beneficial owner of an account or the true beneficiary of a transaction.
- Lack of effective monitoring of cross-border currency movements.
- No reporting requirements for large cash transactions.
- No requirement to maintain financial records over a specific period of time.
- No mandatory requirement to report suspicious transactions or a pattern of inconsistent reporting under a voluntary system; lack of uniform guidelines for identifying suspicious transactions.
- Use of bearer monetary instruments.
- Well-established nonbank financial systems, especially where regulation, supervision, and monitoring are absent or lax.
- Patterns of evasion of exchange controls by legitimate businesses.
- Ease of incorporation, in particular where ownership can be held through nominees or bearer shares, or where off-the-shelf corporations can be acquired.
- No central reporting unit for receiving, analyzing and disseminating to the competent authorities information on large value, suspicious or unusual financial transactions that might identify possible money laundering activity.

- Lack of or weak bank regulatory controls, or failure to adopt or adhere to Basel Committee’s “Core Principles for Effective Banking Supervision”, especially in jurisdictions where the monetary or bank supervisory authority is understaffed, under-skilled or uncommitted.
- Well-established offshore financial centers or tax-haven banking systems, especially jurisdictions where such banks and accounts can be readily established with minimal background investigations.
- Extensive foreign banking operations, especially where there is significant wire transfer activity or multiple branches of foreign banks, or limited audit authority over foreign-owned banks or institutions.
- Jurisdictions where charitable organizations or alternate remittance systems, because of their unregulated and unsupervised nature, are used as avenues for money laundering or terrorist financing.
- Limited asset seizure or confiscation authority.
- Limited narcotics, money laundering, and financial crime enforcement and lack of trained investigators or regulators.
- Jurisdictions with free trade zones where there is little government presence or other supervisory authority.
- Patterns of official corruption or a laissez-faire attitude toward the business and banking communities.
- Jurisdictions where the U.S. dollar is readily accepted, especially jurisdictions where banks and other financial institutions allow dollar deposits.
- Well-established access to international bullion trading centers in New York, Istanbul, Zurich, Dubai and Mumbai.
- Jurisdictions where there is significant trade in or export of gold, diamonds and other gems.
- Jurisdictions with large parallel or black market economies.
- Limited or no ability to share financial information with foreign law enforcement authorities.

Chemical Controls

Introduction

Amendments to the Foreign Assistance Act contained in the Combat Methamphetamine Epidemic Act of 2005 (CMEA)(Title VII, USA Patriot Improvement and Reauthorization Act 2005, P.L. 109-177) require that additional information be included in the International Narcotics Control Strategy Report (INCSR) section on the major sources of precursor chemicals used in the production of illicit narcotic drugs (22 USC section 2291h(a)(3)). The format of the 2007 Chemical Control Chapter has been changed to include the additional information required by Section 722 of the CMEA. The CMEA recognizes the grave threats that methamphetamine trafficking and addiction pose for America and, among other provisions, calls for additional reporting on international trade in the precursor chemicals used for methamphetamine manufacture. To meet these requirements, the final two sections

of this chapter are devoted to methamphetamine chemicals and the Section 722 reporting requirements.

The controls required by the CMEA and state laws on domestic over-the-counter sales of pharmaceutical preparations containing chemicals that can be used as methamphetamine precursors have significantly reduced the number of "small toxic labs" in the United States, those producing small amounts of methamphetamine, primarily using pharmaceutical preparations as a source of chemicals. These small labs had comprised the vast majority of labs seized, if not the largest total quantities of methamphetamine produced. As a result of their marked decrease, even more illicit production has shifted to "super labs" that can produce ten pounds or more of methamphetamine in a single production cycle. With the expansion of superlabs, production is increasingly taking place in Mexico. The super labs generally rely for chemicals on ephedrine and pseudoephedrine, and pharmaceutical preparations containing them, diverted at various stages from international commerce. The Government of Mexico has reacted strongly to this threat and traffickers are seeking new sources and routes for their chemicals. There are also indications that traffickers are starting to use unregulated substitute chemicals and natural ephedra as raw materials, although this requires more raw material, and produces a less pure product.

The methamphetamine precursors, ephedrine and pseudoephedrine, will continue as a major focus of chemical control in 2007. A U.S.-drafted resolution adopted by the March 2006 UN Commission on Narcotic Drugs [1] (CND) requested countries to provide to the International Narcotics Control Board [2] (INCB) estimates of their legitimate requirements for these and other synthetic drug chemicals. [3] This will allow authorities in exporting and importing countries to do a quick "reality" check on proposed transactions, especially as traffickers turn to countries not normally trading in these chemicals as conduits for diversion. The U.S. Government will push for a full response to the resolution's request for estimates.

The emphasis on methamphetamine chemicals does not reduce the importance of continuing vigilance to prevent the diversion of chemicals for use in the illicit manufacture of other drugs. The explosion of opium poppy cultivation and heroin manufacture in Afghanistan focuses particular attention on the heroin essential chemical acetic anhydride. A November 27, 2006, meeting of the Paris Pact, a group of countries impacted by and concerned with Afghan heroin, noted there is no legitimate requirement for acetic anhydride in Afghanistan, and that it would be most effective to concentrate on preventing its illegal entry into the country. Appropriate law enforcement measures will be an important agenda item for future meetings.

Cocaine and heroin manufactured in the Americas remain major drug threats and preventing the diversion of potassium permanganate, a key chemical for cocaine manufacture, and acetic anhydride, are important regulatory and law enforcement objectives. The U.S. Government will continue working bilaterally and through OAS/CICAD to prevent chemical diversion in this hemisphere.

All these chemicals, as with virtually all other chemicals used in illicit drug manufacture, are traded widely in international commerce. Therefore, extensive international cooperation is required to prevent their diversion from licit commercial channels. Two on-going multilateral law enforcement operations targeting key chemicals provide frameworks for this cooperation. Project Cohesion targets potassium permanganate and acetic anhydride and Project Prism targets synthetic drug chemicals. The INCB plays a central coordinating role in their implementation. The United States is the largest financial supporter of the INCB databank project, which is essential to its coordinating role. In the second half of 2006, Project Cohesion monitored 472 shipments of acetic anhydride and 494 shipments of potassium permanganate, and Project Prism monitored over 900 shipments of the amphetamine and methamphetamine precursors ephedrine and pseudoephedrine.

Despite these efforts, the enduring availability of illicit drugs shows that chemical diversion continues. Some of the obstacles to ending it completely include the large quantities of drug precursor chemicals licitly produced and the small percentage of this production that needs to be diverted to satisfy the requirements for illicit drug manufacture, the large number of chemical transactions, international and domestic, that must be monitored to prevent diversion, the many avenues for diversion, and the rapidity with which traffickers can adjust to effective chemical controls.

Role of Chemicals in Drug Manufacture

Chemicals are essential to the manufacture of narcotic drugs. They become an integral component in the case of synthetic drugs, and are required for the processing of coca and opium into heroin and cocaine. Only marijuana, of the major illicit drugs of abuse, is available as a natural, harvested product.

Chemicals used in drug manufacture are divided into two categories, precursor and essential chemicals, although the term "precursors" is often used to identify both. Precursor chemicals are those used in the manufacture of synthetic drugs and they become part of the final product. Essential chemicals are used in the refining of coca and opium into cocaine and heroin. Although some remain in the final product, the basic raw material is the coca or opium. Many chemicals required for illicit drug manufacture have extensive commercial applications, are widely traded, and are available from numerous source countries.

Chemical Diversion Control

Chemical diversion control is a proactive and straightforward strategy to deny traffickers the chemicals they must have. A first essential element is the regulation of licit commerce in the chemicals most necessary for drug manufacture to ensure that transactions are permitted to proceed only after legitimate end-uses for the chemicals involved have been established. This requires verifying that both the chemicals and the quantities ordered are appropriate for the needs of the buyer.

A second essential element of chemical control is tracking shipments to prevent diversion in transit. Ideally, this would be to the ultimate consignee, but this is complicated given the number of shipments and the many middlemen, wholesalers, distributors, etc., involved. Diversion can occur anywhere along the transaction chain.

Pre-export notifications (PENs) and voluntary multilateral tracking systems are employed to verify legitimate end-use and to prevent diversion in transit. The 1988 United Nations Convention against Illicit Trafficking in Narcotic Drugs and Psychotropic Substances (1988 UN Drug Convention) has two tables listing chemicals under its control. Table I is primarily synthetic drug precursor chemicals, including ephedrine and pseudoephedrine. Table II is primarily essential chemicals, including potassium permanganate and acetic anhydride, used in the manufacture of other drugs. In the case of Table I chemicals, and upon the request of the importing country, The Convention requires that the exporting country must provide to the importing country prior notification of the details of transactions involving them. In 1998, the United States succeeded in having a pre-export notification requirement for potassium permanganate and acetic anhydride included in the chemical control action plan adopted by the United Nations General Assembly Special Session Devoted to Countering the World Drug Problem Together. Some countries, in cases of sensitive chemicals or exports to drug-producing regions, will not approve exports until they receive a positive response to the PEN verifying the legitimacy of the proposed transaction.

Projects Prism and Cohesion are multilateral cooperative mechanisms for tracking shipments. Their success depends on widespread and active participation. Effective participation requires the promulgation of national chemical control regimes, the regulatory structures to implement them, and the law enforcement structures to enforce them. The national regimes must include provisions for multilateral information exchange, while respecting the legitimate commercial interests of the businesses involved.

Effective participation can also be influenced by a government's approach to chemical control. Some governments consider it a health issue to be handled by health ministries, with a primary interest in protecting public health. Others consider it a trade issue to be handled by trade ministries or agencies with a bias towards promoting, not regulating trade. If these organizations do not allow sufficient scope for law enforcement, as well as regulatory measures in support of chemical control, they may unwittingly undermine this effective anti-drug strategy.

International Framework for Chemical Control

Article 12 of the 1988 UN Drug Convention is the framework for multilateral cooperation in chemical control. It establishes the obligations and international standards for parties to the Convention to observe in controlling their chemical

commerce to prevent diversion to illicit drug manufacture. The two tables of the Annex to the Convention list 23 chemicals as those most necessary for drug manufacture and, therefore, subject to control. The Convention contains provisions for adding and deleting chemicals from the tables. Signatories to the Convention accept the obligation to enact national laws and regulations to carry out its provisions.

The European Union has chemical control regulations binding on all Member States. The regulations are updated regularly, most recently in 2005. The EU regulations meet the chemical control provisions of the 1988 UN Drug Convention. EU Member States implement the regulations through national laws and regulations.

The U.S. has a chemical control agreement with the European Union, signed on May 28, 1997. It is particularly valuable in that it involves a 27-Member State organization representing some of the world's largest chemical manufacturing and trading nations. As a result of this agreement and a natural confluence of interests, U.S./European cooperation in chemical control is excellent.

The Inter-American Drug Abuse Control Commission of the Organization of American States (CICAD) has approved Model Regulations for the control of drug-related chemicals that set a high standard for government action. The Model Regulations cover all the chemicals included in the 1988 UN Drug Convention. Many Latin American countries have adopted chemical control laws and regulations based on the CICAD Model Regulations. A CICAD experts group on chemical control meets annually to coordinate efforts in the hemisphere.

The 1988 UN Drug Convention, regional regulations, model legislation, and national legislation and regulations, provide frameworks for chemical control regimes. They do not provide the practical mechanisms for the multilateral cooperation required for their successful implementation internationally. The United States and other governments use annual meetings of the UN Commission on Narcotic Drugs (CND) and ad hoc arrangements to highlight emerging chemical control concerns, and to lay the groundwork for voluntary information exchange and chemical tracking mechanisms, such as Projects Cohesion and Prism.

The CND can be used to forge consensus on more formal procedures. However, many governments resist formal arrangements, particularly if they provide for multilateral information exchange beyond that required by the 1988 UN Convention. Moreover, any resolution calling for such arrangements must be approved by the consensus of the 53-member body. The result can be resolutions weakened with caveats and non-obligatory language.

The CND has been effective in establishing procedures for alerting members to trafficker use of substitute chemicals in place of those controlled under the 1988 UN Drug Convention, particularly in the manufacture of synthetic drugs. In 1996, the United States introduced a resolution which was adopted by the CND requesting the

UN International Narcotics Control Board (INCB), with the UN Office of Drugs and Crime, to establish a limited international special surveillance list of chemicals not included in the Convention for which substantial evidence exists of their use in illicit drug manufacture. In 1998, the INCB, drawing on contributions of different governments, established the list to alert governments to the chemicals.

How Traffickers Obtain Chemicals

Chemicals are traded in vast quantities from multiple sources, both domestically and internationally, offering many opportunities for their diversion to illicit drug manufacture. Transshipment or smuggling from third countries into drug producing countries is increasing as the chemical and drug producing countries tighten their chemical controls, particularly in the case of synthetic drug precursors. The exploitation of pharmaceutical preparations containing easily extractable pseudoephedrine is a major source of that key chemical used in illicit manufacture of methamphetamine.

The following are some of the more common diversion and other methods used to obtain chemicals.

- Traffickers extract chemicals, particularly pseudoephedrine, from pharmaceutical preparations. Under prevailing international interpretations of the 1988 UN Drug Convention, it does not control pharmaceutical preparations, allowing them to be traded internationally without regard to legitimate requirements unless exporting and importing countries impose such controls.
- Chemicals are diverted from domestic chemical production to illicit in-country drug manufacture.
- Chemicals are imported legally into drug-producing countries with official import permits and subsequently diverted.
- Chemicals are manufactured in or imported by one country, diverted from domestic commerce, and smuggled into drug-producing countries.
- Chemicals are mislabeled or re-packaged and sold as non-controlled chemicals.
- Chemicals are shipped to countries or regions where no systems exist for their control.
- New drugs ("designer drugs") are developed that have physical and psychological effects similar to controlled drugs, but which can be manufactured with non-controlled chemicals.
- Traffickers manufacture the controlled chemicals they require from unregulated raw materials, a costly and difficult process.
- Traffickers use unregulated substitute chemicals with chemical properties similar to regulated chemicals.

These tactics are masked by the use of front companies, false invoicing, multiple transshipments, use of free trade zones, and any other device that will conceal the true nature of the product, its ultimate recipient or its final end-use.

There is some recycling of the solvents used in heroin and cocaine drug manufacture; recycling cannot be used for acids, alkaline materials or oxidizing agents. Since recycling requires some sophistication, and there is a loss of chemical with each recycling process, it is not a preferred method for unsophisticated laboratories. The precursor chemicals used in the manufacture of synthetic drugs such as methamphetamine and Ecstasy cannot be recycled.

2006 Chemical Diversion Control Trends and Initiatives

The relative profitability of individual drugs is a function of their popularity and their ease of manufacture based on the availability of raw materials. This is the driving force in chemical diversion. Traffickers concentrate on drugs that provide the greatest returns with the greatest ease of manufacture.

In Southeast Asia, the rising popularity of amphetamines and methamphetamine has accelerated a shift in drug manufacture from heroin to synthetic drugs. The availability of synthetic drugs is a factor in their rising popularity, but their availability is spurred by the availability of the chemicals, required for their manufacture, primarily in Burma. Under these circumstances, it is easier and more profitable for traffickers to manufacture synthetic drugs than to cultivate opium and manufacture heroin.

The spread of methamphetamine abuse eastward across the United States was facilitated by the ability of non-professionals, using recipes available on the Internet, to manufacture the drug in small toxic labs ("mom and pop labs") from readily available chemicals, particularly pseudoephedrine extracted from over-the-counter cold remedies.

A common factor in each of these developments is a need for the required chemicals, and the relative ease in obtaining them. The trend towards synthetic drugs probably will continue as the coca and opium required for cocaine and heroin manufacture become more difficult to acquire due to law enforcement and eradication activities.

The shifting emphasis in chemical control toward synthetic drug chemicals reflects this. The key heroin chemical, acetic anhydride, and the key cocaine chemical, potassium permanganate, are already the targets of an on-going multilateral chemical control operation, Project Cohesion. In addition, the Paris Pact countries have placed particular emphasis on the need to prevent acetic anhydride from reaching Afghanistan, noting that given the enormous amount of licit trade in the chemical and the relatively small proportion diverted to Afghanistan, their efforts should focus on law enforcement measures aimed at interdicting smuggling.

The quantity of chemicals required for synthetic drug manufacture is relatively small; depending on the efficiency of the lab, the ratio of pseudoephedrine to

methamphetamine is approximately 1.6 to 1. It can be lower. Thus, a small percentage of diversion from licit trade can meet most chemical requirements for illicit drugs. However, synthetic drug chemicals are primarily Table 1 chemicals in the 1988 UN Drug Convention, the most tightly regulated, so authorities do have a common basis for controlling them.

In 2006, the United States cut off a significant source of chemicals for domestic methamphetamine manufacture with the signing of the CMEA. The Act places strict controls on the sale of over-the-counter pharmaceutical preparations containing easily extractable pseudoephedrine, closing an important chemical source used by small toxic labs. Many U.S. states and other governments already had similar restrictions. However, under prevailing international interpretations, the 1988 UN Drug Convention chemical control provisions do not apply to pharmaceutical preparations containing chemicals controlled by the Convention. Governments must voluntarily control trade in these products.

The United States introduced a resolution adopted by the March 2006 UN Commission on Narcotic Drugs requesting that governments provide to the INCB annual estimates of their requirements for the most critical chemicals used in the manufacture of synthetic drugs and preparations containing them. The estimates, which the INCB will make available for law enforcement purposes, will enable importing and exporting countries to make a quick check on proposed transactions to determine their legitimacy, or if they require further examination, especially in the case of countries that do not normally trade in these chemicals.

The Government of Mexico is already using estimates of its legitimate requirements of ephedrine and pseudoephedrine to drastically cut imports, with a goal of 70 metric tons in 2006.

In response, traffickers are expected to exploit the pharmaceutical preparation exemption in the 1988 UN Drug Convention and to turn to third countries in Central and South America, Africa, West Asia, and other areas that have weak chemical control regimes as conduits for chemicals. They also can turn to unregulated substitute chemicals (pseudoephedrine derivatives) and natural ephedra, although both can complicate the methamphetamine manufacturing process and, in the case of natural ephedra, require up to twenty-five times as much raw material.

The Way Ahead

Synthetic drug chemicals will be a central focus of chemical control efforts in the immediate future, while on-going initiatives against heroin and cocaine chemicals will continue. The U.S. Government will work with the primary producers of ephedrine and pseudoephedrine, bilaterally and multilaterally, to get better controls on these chemicals, with increasing emphasis on pharmaceutical preparations containing them, and stressing the obligation of exporting, importing and transit countries to monitor their trade in controlled chemicals to prevent diversion.

The March 2006 CND resolution requesting that governments provide to the INCB estimates of their legitimate requirements for synthetic drug chemicals and preparations containing them will be a valuable asset to countries in controlling their trade in these products. While the U.S. Government considers this resolution an important step forward, the ability to obtain the information from the INCB is contingent on countries providing the estimates requested by the resolution. The U.S. Government will be pushing for full compliance at the March 2007 CND.

The need for stricter controls on synthetic drug chemicals will be an important agenda item in U.S. counter narcotics discussions with other governments. It was on the agenda of the June and December 2006 U.S./European Union Troika meeting and will remain as long as chemical diversion remains a problem. The Troika meetings are the U.S. Government's most senior regular interaction with the 27-Member State European Union on drug issues.

U.S. participation, and leading role, in Project Prism is another vehicle for increasing cooperation in synthetic drug chemical control. The Project Prism Task Force - - United States (Americas), China (Asia), the Netherlands (Europe), South Africa (Africa), and Australia (Oceania) - - includes some of the most important governments involved in this effort. India, Germany and Mexico are other active participants.

The U.S. Government will also be working with Mexico bilaterally to enhance chemical control cooperation. For example, we are working with Mexican authorities to establish clandestine lab teams in Mexican "hot spot" locations. In addition, the U.S. Government has funded the training of more than 1,500 Mexican officials in a variety of clandestine laboratory and precursor related topics.

The apparent increase in the use of unregulated substitute chemicals in synthetic drug manufacture will require more attention. In addition to highlighting the problem at the March 2007 CND, the U.S. Government will urge governments to notify the INCB and others as they discover this usage. This will facilitate a quick reaction to the substitute chemicals, and allow the INCB to update its surveillance list of chemicals that are being used in illicit drug manufacture and that are not included in the 1988 UN Drug Convention.

The attention to synthetic drug chemicals cannot be at the expense of programs to prevent the diversion of heroin and cocaine chemicals. The U.S. Government will continue its active participation in Project Cohesion and will be working with its Paris Pact partners in joint efforts to prevent acetic anhydride from reaching Afghanistan. In the Americas, bilateral cooperation and multilateral operations will continue to target key precursor chemicals for cocaine, heroin and synthetic drugs.

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Appendix A

INTERNATIONAL DRUG POLICY INVENTORY

Directions: Blacken the circle in the space to the left of each statement according to whether you agree or disagree with the statement. If you are not sure about the statement, blacken the circle in the middle space under undecided.

Example:

Agree Undecided Disagree

 Legal prescription drugs may be sometimes abused by individuals.

Agree Undecided Disagree

- | | | | | |
|-----------------------|-----------------------|-----------------------|----|---|
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | 1. | Illegal drug manufacturers should be given severe prison sentences. |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | 2. | Reducing the need for illegal drug use should be the foundation of drug policy. |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | 3. | We should provide free clinics for drug addicts to get health care. |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | 4. | Illegal drug traffickers should be given severe sentences. |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | 5. | Each country should decide its own drug policies, independently from its neighbors' priorities or wishes. |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | 6. | All drugs should be legal and controlled by the government. |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | 7. | Methadone programs should be available to serious drug abusers. |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | 8. | Drug use and abuse should not be handled by the criminal justice system. |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | 9. | Marijuana should be legalized, like alcohol is in most places. |

- 10. Each country has unique drug problems that should be handled by the country itself.
- 11. The most effective way to prevent the use of drugs is to educate children about the consequences of illegal drug use.
- 12. The focus of our drug policy should be breaking up the illegal drug markets.
- 13. Our drug problem is only made worse by laws against drug use.
- 14. We can't eliminate illegal drug use, but we can reduce some of the harm that illegal use causes.
- 15. It should be against the law to grow or manufacture illegal addictive drugs.
- 16. Drug control policies between countries are likely to be ineffective as local policies.
- 17. The courts should decide what happens to illegal drug users.
- 18. We should control the illegal drug problem by making drugs legal to use.
- 19. Illegal drug users should be sent to prison with severe sentences.
- 20. People who retail illegal drugs should be the concern of our drug policy.
- 21. Major drugs like heroin and cocaine should be legally available.
- 22. The use of drugs like marijuana should be a criminal offense.

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- 23. Poor, third world countries should not be concerned about the drug problem in more economically advantaged countries.
- 24. The most effective strategy to control illegal drugs is to reduce the demand for illegal drugs.
- 25. The most effective strategy to control illegal drugs is to reduce the supply of drugs.
- 26. Serious drug abusers should be provided clean needles in exchange for old ones.
- 27. We should concentrate in stopping the flow of illegal drugs across national borders.
- 28. National efforts to control illegal drugs are more effective than international efforts.
- 29. Farmers who grow illegal drugs should be sent to jail.
- 30. Harsh drug laws do more harm than good.
- 31. Substance-abuse treatment programs for drug offenders should be a focus of drug policy.
- 32. Meaningful legal employment is the best alternative for drug dealers.
- 33. The government shouldn't tell people what they can not put in their bodies.
- 34. The most effective way to prevent the production of illegal drugs is to destroy drug crops by all available means.
- 35. International drug control efforts are likely to fail.

- 36. We should concentrate on reducing the harm associated with illegal drugs instead of total abstinence.
- 37. It should be against the law to traffic in addictive drugs.
- 38. The most effective way to prevent the production of illegal drugs is to provide meaningful economic alternatives for farmers who grow drugs.
- 39. Prison is the best place for illegal drug users.
- 40. Education about the damage of illegal drug use is the best way to prevent widespread misuse of drugs.
- 41. The use of major drugs like heroin or cocaine should be a criminal offense.
- 42. Illegal drug use is a public health problem and not a crime problem.
- 43. Drug control policy should concentrate on the sources of illegal drugs.
- 44. Secret illegal drug labs should be located and destroyed.
- 45. We need to disrupt smuggling operations which transport illegal drugs into the country.
- 46. The focus of our drug policy should be to disrupt criminal drug organizations.
- 47. People who wholesale illegal drugs should be the concern of our drug policy.

International Drug Policy Inventory (IDPI) Scoring Key

Agree = 2
Undecided = 1
Disagree = 0

Reverse Scoring ®

Agree = 0
Undecided = 1
Disagree = 2

The higher the score, the more agreement with the policy. Control Focus scored in “national” direction.

DR = Items: 11, 24, 40, 31, 19R, 2

SR = Items: 15, 29, 38, 34, 25, 1, 43, 44

LG = Items: 21, 9, 18, 33, 6, 13

DC = Items: 22R, 41R, 42, 8, 39R, 17R

DI = Items: 4, 37, 32, 20, 12, 27, 45, 46, 47

CF = Items: 28, 5, 35, 23R, 10, 16

HR = Items: 26, 30, 7, 36, 14, 3

Note: Refer to page 22 for a description of the above abbreviations.

Appendix B: Post Test and Evaluation for

Cluckers, Clockers, and Cookers: An Introduction to Drug Control Policy for Substance Abuse Counselors

Directions: To receive credits for this course, you are required to take a post test and receive a passing score. We have set a minimum standard of 80% as the passing score to assure the highest standard of knowledge retention and understanding. The test is comprised of multiple choice and/or true/false questions that will investigate your knowledge and understanding of the materials found in this CEU Matrix – The Institute for Addiction and Criminal Justice distance learning course.

After you complete your reading and review of this material, you will need to answer each of the test questions. Then, submit your test to us for processing. This can be done in any **one** of the following manners:

1. *Submit your test via the Internet.* All of our tests are posted electronically, allowing immediate test results and quicker processing. First, you may want to answer your post test questions using the answer sheet found at the end of this appendix. Then, return to your browser and go to the Student Center located at:

<http://www.ceumatrix.com/studentcenter>

Once there, log in as a Returning Customer using your Email Address and Password. Then click on 'Take Exam' and you will be presented with the electronic exam.

To take the exam, simply select from the choices of "a" through "e" for each multiple choice question. For true/false questions, select either "a" for true, or "b" for false. Once you are done, simply click on the submit button at the bottom of the page. Your exam will be graded and you will receive your results immediately. If your score is 80% or greater, you will receive a link to the course evaluation, which is the final step in the process. Once you submit the evaluation, you will receive a link to the Certificate of Completion. This is the final step in the process, and you may save and / or print your Certificate of Completion.

If, however, you do not achieve a passing score of at least 80%, you will need to review the course material and return to the Student Center to resubmit your answers.

OR

2. *Submit your test by mail using the answer sheet found at the end of this package.* First, complete the cover page that will identify the course and provide us with the information that will be included in your Certificate of Completion. Then, answer each of the questions by selecting the best response available and marking your answers on the sheet. The final step is to complete the course evaluation (most certifying bodies require a course evaluation before certificates of completion can be issued). Once completed, mail the information, answer and evaluation sheets to this address:

**CEU Matrix - The Institute for Addiction and Criminal Justice Studies
P.O. Box 2000
Georgetown, TX 78627**

Once we receive your exam and evaluation sheets, we will grade your test and notify you of the results.

If successful, you will be able to access your Certificate of Completion and print it. Access your browser and go to the Student Center located at:

<http://www.ceumatrix.com/studentcenter>

Once there, log in as a Returning Customer using your Email Address and Password. Then click on 'Certificate' and you will be presented with a download of your Certificate of Completion that you may save / and or print. If you would rather have your Certificate of Completion mailed to you, please let us know when you mail your exam and evaluation sheets; or contact us at ceumatrix@ceumatrix.com or 800.421.4609.

If you do not obtain the required 80% score, we will provide you with feedback and instructions for retesting.

OR

3. *Submit your test by fax.* Simply follow the instructions above, but rather than mailing your sheets, fax them to us at **((512) 863-2231)**.

If you have any difficulty with this process, or need assistance, please e-mail us at ceumatrix@ceumatrix.com and ask for help.

Answer the following questions by selecting the most appropriate response.

1. The spread of illegal drugs is:
 - a. industrial
 - b. regional
 - c. global
 - d. hemispherical
 - e. modal

2. Illegal drugs affect:
 - a. terrorism
 - b. corruption
 - c. human trafficking
 - d. HIV
 - e. All of the above

3. Drug epidemics are:
 - a. static
 - b. constantly changing
 - c. not changing
 - d. flat at this time
 - e. constant

4. Drugs tend to have _____ faces.
 - a. three
 - b. four
 - c. two
 - d. dark
 - e. distorted

5. Until recently, traditional societies controlled drugs by _____ and _____ controls
 - a. legal, judicial
 - b. physical, legal
 - c. penal, court
 - d. legal, moral
 - e. social, cultural

6. Drug production/manufacturing usually involves:
 - a. precursors
 - b. cursors
 - c. precontracts
 - d. contingencies
 - e. premacks

7. Drug control policy targets _____ zones in the illegal drug industry.

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- a. two
 - b. six
 - c. five
 - d. four
 - e. three
8. A small mobile, clandestine lab to produce meth is:
- a. speed lab
 - b. box lab
 - c. bucket lab
 - d. square lab
 - e. slab lab
9. Clockers are:
- a. cooks who time the chemical reaction
 - b. old time dealers
 - c. dealers who watch the clock
 - d. dealers who only work 8 hours a day
 - e. entry level dealers
10. Cluckers are:
- a. point men
 - b. middle men
 - c. runners
 - d. mules
 - e. bag men
11. A teen age street dealer is called:
- a. jumper
 - b. comic
 - c. clown
 - d. juggler
 - e. jester
12. Drug proceeds are frequently laundered at:
- a. dog houses
 - b. rigged houses
 - c. Giro houses
 - d. slam houses
 - e. cap houses

13. A paper boy is:

- a. a meth cooker
- b. a precursor seller
- c. a money courier
- d. a meth peddler
- e. a heroin peddler

14. A person who carries drugs is called:

- a. mule
- b. donkey
- c. horse
- d. goat
- e. rooster

15. An individual who sells fake crack and then flees is called:

- a. dead head
- b. streaker
- c. sooner
- d. boomer
- e. zoomer

16. A travel agent is:

- a. A courier
- b. An LSD supplier
- c. Chemical salesman
- d. A zoomer
- e. A steerer

17. Transferring bulk and drugs to capsules is called:

- a. cap down
- b. cap up
- c. cap off
- d. capping the cine
- e. pharming

18. Heroin from Afghanistan is called:

- a. PITA
- b. IAP
- c. AIP
- d. Iranian Gold
- e. Pakistani Pop

19. Black gungi is a term for marijuana from:

- a. Somalia
- b. Chile
- c. Mexico
- d. China
- e. India

20. Dagga is marijuana from:

- a. Poland
- b. Spain
- c. South Africa
- d. Iran
- e. Jamaica

21. Ganja is marijuana from:

- a. Poland
- b. Spain
- c. South Africa
- d. Iran
- e. Jamaica

22. Kabak is marijuana from:

- a. Jamaica
- b. Turkey
- c. Greece
- d. Iran
- e. Hawaii

23. Very potent marijuana from Morocco, Lebanon, or other middle eastern countries is called:

- a. Kaff
- b. Khyaf
- c. Kief
- d. All of the above
- e. None of the above

24. Marijuana from Hawaii is called:

- a. Island tea
- b. Dimba
- c. Maui-Wowie
- d. Maui Red
- e. Blue Hawaii

25. Marijuana from Canada is called:
- BC lights
 - Can-am grass
 - Northern flash
 - Northern borealis
 - Northern lights
26. Marijuana from Vietnam is called:
- Red min
 - Blue min
 - Blue de hue
 - Hue gold
 - Saigon gold
27. Ruderalis is marijuana from:
- British Columbia
 - Poland
 - Spain
 - Russia
 - Sweden
28. Blue sky blond is marijuana from:
- Russia
 - Poland
 - Columbia
 - Brazil
 - Mexico
29. Chiba Chiba is high potency marijuana from:
- Russia
 - Poland
 - Columbia
 - Brazil
 - Mexico
30. Caballo, Calbo, Carga, and Carne are all Spanish words for:
- Heroin
 - Marijuana
 - Cocaine
 - Meth
 - Peyote

31. Drug treatment programs are included as a type of which drug control strategy?
- Harm reduction
 - Demand reduction
 - Supply reduction
 - Control focus
 - Trafficking reduction
32. Methadone maintenance is a form of which type of drug control strategy?
- Harm reduction
 - Demand reduction
 - Supply reduction
 - Prohibition
 - Legalization
33. One of the serious disadvantages of decriminalization of drugs is:
- dual diagnosis
 - dual treatment
 - dual convictions
 - dual mandate
 - dualism
34. The country that has the second largest producer of opium in the world in 2005 was:
- Thailand
 - Burma
 - Laos
 - China
 - Vietnam
35. Europe is the major source of:
- MDMA
 - Cocaine
 - Heroin
 - Marijuana
 - Opium
36. FARC, AUC, and ELN are terrorist groups in:
- Laos
 - Brazil
 - Russia
 - Iran
 - Columbia

37. The largest illicit opium-producing country in the world is:
- Laos
 - Columbia
 - Afghanistan
 - Burma
 - Nigeria
38. The Caribbean plays a prominent role in:
- marijuana growing
 - heroin production
 - meth production
 - cocaine production
 - money laundering
39. A thriving industry in Canada is:
- cannabis cultivation
 - heroin production
 - synthetic drug production
 - cocaine production
 - both "a" and "c"
40. Most of the illicit drugs that enter the U.S. are:
- smuggled through the ports
 - smuggled across the Canadian border
 - smuggled through Florida
 - smuggled across the US-Mexico border
 - Flown in to clandestine airstrips
41. Modern day crime transactions are usually instruments of Dollars, Euros, and _____.
- Pesos
 - Certificates of deposit
 - Gold
 - Silver
 - Diamonds
42. The FATF has created the _____ recommendations.
- 10 + 1
 - 2 + 2
 - 40 + 9
 - 20 + 5
 - 6 + 6

43. A key vulnerability factor in controlling money launderers is a lack of what requirements?
- Know your drug
 - Drug knowledge
 - Know you neighbor
 - Know your monetary instruments
 - Know—your—client
44. Super labs are increasingly taking place in:
- Turkey
 - Mexico
 - Laos
 - Brazil
 - Florida
45. The ratio of pseudoephedrine to methamphetamines is:
- 1 to 1
 - 5.6 to 1
 - 10.6 to 1
 - 1.6 to 1
 - 6 to 1

Fax/Mail Answer Sheet
CEU Matrix - The Institute for Addiction and Criminal Justice Studies
Coursework

Test results for the course "Cluckers, Clockers and Cookers..."

If you submit your test results online, you do not need to return this form.

Name*: _____
(* Please print your name as you want it to appear on your certificate)

Address: _____

City: _____

State: _____

Zip Code: _____

Social Security #*: _____
(*Most certifying bodies require a personal identification number of some sort – last 4 digits or License is perfect.)

Phone Number: _____

Fax Number: _____

E-mail Address: _____

On the following sheet, mark your answers clearly. Once you have completed the test, please return this sheet and the answer sheet in one of the following ways:

1. Fax your answer sheets to the following phone number: **(512) 863-2231**. This fax machine is available 24 hours per day. **OR**
2. Send the answer sheet to:
CEU Matrix - The Institute for Addiction and Criminal Justice Studies
P.O. Box 2000
Georgetown, TX 78627

You will receive notification of your score within 48 business hours of our receipt of the answer sheet. If you do not pass the exam, you will receive instructions at that time.

Name: _____

**Course: Cluckers, Clockers, and Cookers: An Introduction to Drug Control
Policy for Substance Abuse Counselors**

- | | | |
|-------------------------|-------------------------|-------------------------|
| 1. [A] [B] [C] [D] [E] | 16. [A] [B] [C] [D] [E] | 31. [A] [B] [C] [D] [E] |
| 2. [A] [B] [C] [D] [E] | 17. [A] [B] [C] [D] [E] | 32. [A] [B] [C] [D] [E] |
| 3. [A] [B] [C] [D] [E] | 18. [A] [B] [C] [D] [E] | 33. [A] [B] [C] [D] [E] |
| 4. [A] [B] [C] [D] [E] | 19. [A] [B] [C] [D] [E] | 34. [A] [B] [C] [D] [E] |
| 5. [A] [B] [C] [D] [E] | 20. [A] [B] [C] [D] [E] | 35. [A] [B] [C] [D] [E] |
| 6. [A] [B] [C] [D] [E] | 21. [A] [B] [C] [D] [E] | 36. [A] [B] [C] [D] [E] |
| 7. [A] [B] [C] [D] [E] | 22. [A] [B] [C] [D] [E] | 37. [A] [B] [C] [D] [E] |
| 8. [A] [B] [C] [D] [E] | 23. [A] [B] [C] [D] [E] | 38. [A] [B] [C] [D] [E] |
| 9. [A] [B] [C] [D] [E] | 24. [A] [B] [C] [D] [E] | 39. [A] [B] [C] [D] [E] |
| 10. [A] [B] [C] [D] [E] | 25. [A] [B] [C] [D] [E] | 40. [A] [B] [C] [D] [E] |
| 11. [A] [B] [C] [D] [E] | 26. [A] [B] [C] [D] [E] | 41. [A] [B] [C] [D] [E] |
| 12. [A] [B] [C] [D] [E] | 27. [A] [B] [C] [D] [E] | 42. [A] [B] [C] [D] [E] |
| 13. [A] [B] [C] [D] [E] | 28. [A] [B] [C] [D] [E] | 43. [A] [B] [C] [D] [E] |
| 14. [A] [B] [C] [D] [E] | 29. [A] [B] [C] [D] [E] | 44. [A] [B] [C] [D] [E] |
| 15. [A] [B] [C] [D] [E] | 30. [A] [B] [C] [D] [E] | 45. [A] [B] [C] [D] [E] |

Cluckers, Clockers, Cookers – An Introduction to Drug Control Policy for Substance Abuse Counselors

CEU Matrix

The Institute for Addiction and Criminal Justice Studies

Course Evaluation – Hard Copy Format

The final step in the process required to obtain your course certificate is to complete this course evaluation. These evaluations are used to assist us in making sure that the course content meets the needs and expectations of our students. Please fill in the information completely and include any comments in the spaces provided. Then, if mailing or faxing your test results, return this form along with your answer sheet for processing. **If you submit your evaluation online, you do not need to return this form.**

NAME: _____

COURSE TITLE: **Cluckers, Clockers, and Cookers: An Introduction to Drug Control Policy for Substance Abuse Counselors**

DATE: _____

<u>COURSE CONTENT</u>		
Information presented met the goals and objectives stated for this course	<input type="checkbox"/> Start Over <input type="checkbox"/> Good <input type="checkbox"/> Excellent	<input type="checkbox"/> Needs work <input type="checkbox"/> Very Good
Information was relevant	<input type="checkbox"/> Start Over <input type="checkbox"/> Good <input type="checkbox"/> Excellent	<input type="checkbox"/> Needs work <input type="checkbox"/> Very Good
Information was interesting	<input type="checkbox"/> Start Over <input type="checkbox"/> Good <input type="checkbox"/> Excellent	<input type="checkbox"/> Needs work <input type="checkbox"/> Very Good
Information will be useful in my work	<input type="checkbox"/> Start Over <input type="checkbox"/> Good <input type="checkbox"/> Excellent	<input type="checkbox"/> Needs work <input type="checkbox"/> Very Good
Format of course was clear	<input type="checkbox"/> Start Over <input type="checkbox"/> Good <input type="checkbox"/> Excellent	<input type="checkbox"/> Needs work <input type="checkbox"/> Very Good
POST TEST		
Questions covered course materials	<input type="checkbox"/> Start Over <input type="checkbox"/> Good <input type="checkbox"/> Excellent	<input type="checkbox"/> Needs work <input type="checkbox"/> Very Good
Questions were clear	<input type="checkbox"/> Start Over <input type="checkbox"/> Good <input type="checkbox"/> Excellent	<input type="checkbox"/> Needs work <input type="checkbox"/> Very Good
Answer sheet was easy to use	<input type="checkbox"/> Start Over <input type="checkbox"/> Good <input type="checkbox"/> Excellent	<input type="checkbox"/> Needs work <input type="checkbox"/> Very Good

Cluckers, Clockers, Cookers – An Introduction to Drug Control Policy for Substance Abuse Counselors

**CEU Matrix – The Institute for Addiction and Criminal Justice Studies
Course Evaluation – Page 2**

Cluckers, Clockers, and Cookers: An Introduction to Drug Control Policy for Substance Abuse Counselors

COURSE MECHANICS		
Course materials were well organized	<input type="checkbox"/> Start Over <input type="checkbox"/> Good <input type="checkbox"/> Excellent	<input type="checkbox"/> Needs work <input type="checkbox"/> Very Good
Materials were received in a timely manner	<input type="checkbox"/> Start Over <input type="checkbox"/> Good <input type="checkbox"/> Excellent	<input type="checkbox"/> Needs work <input type="checkbox"/> Very Good
Cost of course was reasonable	<input type="checkbox"/> Start Over <input type="checkbox"/> Good <input type="checkbox"/> Excellent	<input type="checkbox"/> Needs work <input type="checkbox"/> Very Good
OVERALL RATING		
I give this distance learning course an overall rating of:	<input type="checkbox"/> Start Over <input type="checkbox"/> Good <input type="checkbox"/> Excellent	<input type="checkbox"/> Needs work <input type="checkbox"/> Very Good
FEEDBACK		
How did you hear about CEU Matrix?	<input type="checkbox"/> Web Search Engine <input type="checkbox"/> Mailing <input type="checkbox"/> Telephone Contact <input type="checkbox"/> E-mail posting <input type="checkbox"/> Other Linkage <input type="checkbox"/> FMS Advertisement <input type="checkbox"/> Other: _____	
What I liked BEST about this course:		
I would suggest the following IMPROVEMENTS:		
Please tell us how long it took you to complete the course, post-test and evaluation:	_____ minutes were spent on this course.	
Other COMMENTS:		

Cluckers, Clockers, Cookers – An Introduction to Drug Control Policy for Substance Abuse Counselors