

Targeting organised drug syndicates *as business entities*

Federal Agent Ross Hodgkinson first delivered this paper to the Societies of Criminology First Key Issues Conference held in Paris earlier this year. Federal Agent Hodgkinson, Coordinator Protective Security Development put the case that organised crime to be successful often adopts traditional corporate approaches to their business.

He explores the position that this structure may just be the very weakness that police can exploit to bring about the end of particular criminal enterprises.



Federal Agent Ross Hodgkinson

In the past few decades crime has become more organised, more sophisticated and increasingly international in nature. It has also become more profitable.

(R. McDonell, NCA, Money Laundering Methodologies and International and Regional Countermeasures, 1998).

Traditional policing has emphasised apprehending and prosecuting individual offenders, while recognising that drug supply and distribution involved complex networks. Innovative strategies being currently developed by police agencies including the AFP target organisations as a whole, seen as business entities. This can involve attention to recruitment, financing, transport, style of governance and management practices. Organisational structures have become increasingly diverse, as older family based authoritarian groups are joined by more efficiency driven corporate structures. Because the illegal syndicates are mimicking legitimate businesses in their operations, this provides increased vulnerability to intervention by police trained in business practices. These initiatives provide a new form of harm minimisation, by incapacitating organisations without overloading the criminal justice system and contributing to the growth in the number of drug offenders in prison.

Law enforcement used to be simple, or at least comparatively so. We would investigate offences, compile evidence and bring offenders to justice. We collected inculpatory and exculpatory evidence according to the required proofs for particular offences and forwarded completed briefs to prosecutors.

Unfortunately, this model fell far short of modern requirements and expectations under at least two criteria. Firstly, the sophistication of criminal enterprises has risen sharply, often outpacing law enforcement in terms of adoption of technology and adaptation of capabilities. Drug syndicates are not subject to the intricacies of legislative change and other 'rules of engagement'. On the positive

side, this increasing complexity forces criminal syndicates to adopt more substantial governance mechanisms and formalised structures. In this at least, there is a tendency to follow the forms of successful legitimate business.

Secondly, and at least as importantly, the system did not provide sufficient benefits to society. The main justifications for imprisoning offenders are:

- (a) punishment for a transgression of the law,
- (b) deterrence to others from such transgressions; and,
- (c) maintaining the safety and well being of members of society.

In terms of the 'punishment' driver, criminal syndicates have created and enhanced sophisticated mechanisms to minimise the likelihood of 'senior personnel' ending up in prison. Even when a successful prosecution results in the imprisonment of 'key criminals', those persons are often able to continue to operate (organise) criminal activities from within prison. In other cases the convicted persons have simply been replaced, with marginal adverse impacts on the organisation's criminal activities.

The abundance of transnational criminal activity signifies that current levels of deterrence are suboptimal. Media reporting and statistical evidence¹ suggest that, leading up to the recent heroin drought in Australia, the frequency and size of narcotic importations were increasing. Certainly there has been a shift away from heroin to synthetics². Of particular note is that narcotic importation syndicates continue to act in a manner that suggests that the risks associated with importing, storing and distributing the narcotics, as well as laundering the proceeds from the criminal activity, are still far outweighed by the returns generated by the activity. Drug importation to Australia is predominantly supply driven and the market is apparently conducive to those activities.

Finally, the levels of safety and comfort, real and perceived, provided to individuals in society are notoriously difficult to measure

accurately. Certainly, media reports portray a continuing significant decline, which feeds the public perception. Statistical analysis indicates differently but there is undoubtedly increasing awareness of and application to addressing the social impacts of crime.

None of this is intended to indicate that law enforcement, or other involved industries, have been insufficiently active in addressing these issues. There is an ongoing development of capabilities and sophistication within law enforcement. AFP successes over a period of several years have created a degree of deterrence, especially to less well organised and financed drug syndicates³. Consistent with this process is the logical move towards harm minimisation and disruption of criminal activity as additional crime management strategies. Similarly, law enforcement is now much more inclusive than was previously the case. We work together with all relevant parties to achieve our intended outcomes.

We will always need law enforcement that uses consequential imprisonment as both a deterrent and a safety mechanism, but we are also continually striving to implement appropriate strategies to enhance and extend societal benefits.

The AFP does not as yet have a formal program encompassing the investigation of all business factors associated with drug syndicates, but does have policies that reinforce a commitment to continual implementation and enhancement of innovative crime management strategies⁴. The AFP is also a strong proponent of 'intelligence led' policing.

The research will touch on one such strategy that may be useful as an adjunct to current crime management strategies, or at least be the subject of further research and consideration by interested persons.

Concept Overview

The (well founded) focus of law enforcement has largely been directed towards bringing offenders to justice. That is to say, investigations are centred on the *personnel* within an organisation. Much work is done analysing many factors surrounding the persons, but it is principally undertaken with a view to accumulating evidence leading to a conviction. Incarceration of key criminal personnel will always be an effective way to disrupt a well organised enterprise and my research is projected to add to that effectiveness. The AFP will be able to target more significant criminal personnel when we understand the organisations better and will also be able to more efficiently pursue our regulatory and legislative change processes.

Crime has become significantly more transnational in character and so, to a degree, has law enforcement. The AFP has been a leader in the development of transnational crime management. Key criminal personnel may never travel to the jurisdiction to which the narcotics are imported and so effective cooperation between agencies has expanded substantially.

It no longer matters (as much) where in the world, or how, or by whom the criminal syndicates are disrupted, rather just that they are.

Australia also has criminal (and civil in some jurisdictions) forfeiture legislation enabling seizure of assets found to be acquired through the conduct of criminal activity. While important and potentially effective, the legislation is essentially designed to claw back benefits accrued by criminals after the event.

The research model under discussion here is intended to extend and supplement available investigation practices, with the structures of criminal syndicates and the conduct/viability of those businesses being the focus of analytical effort. My research is intended to identify vulnerabilities within the organisation, be they human, structural, systemic or process, that may be exploited in terms of harm minimisation or criminal activity disruption.

The business vulnerabilities can be identified through the analysis of key economic and organisational variables those factors that tend to make businesses successful and those that lead to business failure. The aim is to ascertain methods and systems that would tend to lower the success, in business terms, of the criminal organisations and therefore provide a comparative benefit to society.

Assumptions

A number of assumptions relevant to the proposed research model are given as exemplars:

- Drug syndicates can be categorised as organised crime and are emulating some legitimate business practices.
- Businesses operate in an economically rational manner.
- There are particular actions or functions associated with normal business activity that tend to reinforce successful business outcomes.
- As organisation increases so does dependency on formalised structures and operating procedures.
- Criminal organisations may attract competitive advantages and disadvantages compared to legitimate business through the particular circumstances surrounding their business operations.
- Criminal organisations take various forms and have structures aligned by such factors as size, industry and history.
- All organisations must adapt to a changing environment or decline over time.
- Organised crime syndicates are inherently secretive and structured to take advantage of perceived or actual weaknesses in social systems, including economic, business, law enforcement and legislative weaknesses.

Economic Factors

When looking at the economic factors surrounding the operations of criminal syndicates, a number of questions become apparent in order that the specific business analysis is able to be undertaken in a contextually valid manner. We need to ascertain market information as well as supply/demand and inherent cost structure information. Indicative questions are likely to include:

- Why do criminal organisations choose to enter a particular market?
- What are the sunk costs specific to drug markets?
- Why a criminal rather than legitimate market?
- What are the marginal costs of operating in a drug market?
- How are the markets structured?
- How are the supply and demand curves shaped?
- What is the growth potential for drug markets?
- How do specific syndicates fit within the market parameters?
- What are the relevant risk/return equations?
- How do criminal syndicates compare in economic and organisational terms to legitimate businesses?

Organisational Factors

Analysis of organisational factors follows from and to some extent, overlaps the outputs of economic research. The check list of factors provided below is not intended to be exhaustive, rather it is an easy starting point for consideration of potential vulnerabilities. Some of these items are already thoroughly analysed by law enforcement in the course of the normal investigative process, some less so and the table is provided to illustrate the strong intelligence alignment required to develop appropriate hypotheses.

Table 1: Initial candidates for analysis

Factors for Analysis	Examples/Indicators
Description of Investigation	• Drug importation
Commodity(ies)	<ul style="list-style-type: none"> • Drugs - heroin, cocaine, synthetics • Money laundering / People smuggling/trafficking • Others (define)
Quantity(ies)	<ul style="list-style-type: none"> • Commercial • Weights
Source	• International - from (country?)
Organisation structure	<ul style="list-style-type: none"> • Hierarchical, Facilitator, • Purchaser/provider, contractor, other • Vertical/horizontal integration, specialisation • Strategic intent - management style • Size, flexibility (adaptability) • Staff numbers, operating structures, gross turnover, profit margins, cash flow status...
Market analysis	<ul style="list-style-type: none"> • What market is this organisation in? • How does this organisation operate within the market? • Where is it positioned in the market? • Barriers to entry / Competition - criminal/legitimate
History	<ul style="list-style-type: none"> • new entrant, established player, oligopoly • competition / regulation
Ethnicity/sociological component	• Unitary / Free interaction
Decision makers	• Path, style
Finance	<ul style="list-style-type: none"> • Where/how obtained - internal/external • How managed
Transport	• Mode
Relationships	<ul style="list-style-type: none"> • Internal / Between syndicates - external • Corruption/influence
Distribution	<ul style="list-style-type: none"> • Specialisation • Mode
Communication	<ul style="list-style-type: none"> • Specialisation • Mode
Security	<ul style="list-style-type: none"> • Specialisation • Modes
Supply factors	• Economic / Cultural-political / Environmental
Markets	<ul style="list-style-type: none"> • Single/multiple • Developing/mature/declining
Interaction with legitimate business	<ul style="list-style-type: none"> • Criminality 'concealed' through legitimate operations • Use of legitimate businesses for criminal activity • Move to wholly legitimate business
Specific issues or exceptions	• Previous failures

If we take “Communication” as an example, we know that law enforcement already conducts significant analysis on who communicates with whom, how often, using what means and how important the communication may be. We know that drug syndicates rely heavily on secure communications technology and expend significant amounts of money and resources ensuring that the communication is appropriate to their needs. Syndicates have been known to purchase communications companies, or influence operators of legitimate communications companies. They use telecommunications equipment in a sophisticated manner and regularly use both codes and encryption.

Having said that, much less analysis is undertaken relevant to the communication infrastructure required for successful conduct of criminal activity, development of vulnerabilities associated with communication and how those vulnerabilities may be exploited. What are the business differences that may arise when different communications strategies are implemented? What would happen if law enforcement had legislative and technical capabilities to efficiently access encrypted communications? What would be the implications arising from additional regulation on telecommunications suppliers regarding identification of purchasers (similar to 100 point bank schemes) and on the vetting of such suppliers themselves (similar to character checks)?

Organisational Structures

There are a number of well recognised business structures evidenced within organised crime syndicates. These range from the ‘hierarchical’ to the ‘cooperative’. The example of a drug syndicate undertaking a series of importations, discussed within in this paper, will look more closely at what has been termed the ‘facilitative’ structure⁶.

For the sake of clarity, the ‘hierarchical’ structure can be described as roughly triangular in shape. It has one or few senior persons at the apex of the triangle who are essentially accountable for the strategic direction of the organisation. Command and control authority resides at this level. The organisational executive can be included towards the apex and usually have a major functional or geographic responsibility. The next tier of authority (middle managers) are accountable for the routine management of outputs. This structure is usually well defined and the functions and tasks associated with operational activity are understood by the participants. This structure is often classified as being bound by rules and rigidity.

The cooperative model is generally understood to be used when individual organisations are too small to undertake some function effectively by themselves (entry barriers too high or unable to compete in terms of efficiencies of scale) and so unite to undertake some activity. They are often flexible in structure and associations are formed and disbanded according to need and convenience.

This structure has often been used in the past to describe one style of organised crime syndicate (a loose knit cluster of individuals/ subgroups that come together for a common criminal purpose). The cooperative can be formed along functional lines (transport specialist joins with finance provider and producer) or simply to attain sufficient market size (multiple small organisations with similar functions). These cooperatives can be vulnerable to internal bickering (perceptions of potential additional benefits available to individual parties), to effects of larger players in the market (predatory trading or buyout) and to external attack on individual components (loss of finance).

As the demand for increasing efficiency and security of senior personnel escalates within organised crime syndicates and the increasing effectiveness of law enforcement disrupts the activities of those organisations, there is a trend to developing novel organisational structures. One such structure can be expressed as the facilitative model. The structure has components of various other structures but is applied in an innovative manner that sets it apart from most others.

The facilitative structure can be visualised as being roughly hourglass in shape. There are elements of hierarchy but also strong horizontal elements. The three main areas of operation are the investors, the facilitator and the recipients. Both recipients and facilitators may have equal standing to some of the investors in terms of influence and authority but take on different roles according to the projects being conducted.

In this context the investors represent the senior management or topmost level of different syndicates and act primarily in an entrepreneurial manner, rather than on a ‘turf’ basis.

In the groups analysed for this paper, ethnicity was still quite a strong consideration by the personnel involved. Successful working relationships existed between different ethnic groups, but the primacy of the lead group was maintained at all times.

The investors can and do arrange importations from within their own syndicates but may also come together with other interested investors to arrange importations of greater security, size and profitability, and with less personal risk (major risks include loss of capital and loss of personal liberty). The investors are well known to each other, and importantly, hold significant trust in each other through previous interactions.

Essentially the investors form a temporary board of management that come together to consider and approve proposals.

These proposals are submitted by various representatives (usually one or two 'instigators') who are seeking further investors to get an operation off the ground and are approved subject to particular criteria, including available funding, available resources, number of concurrent active projects, return on investment and risk analysis. The investors approve and fund any selected and prioritised projects. Investors may send 'overseas representatives' (separately from the facilitator) to oversight importations and to ensure their interests are maintained. A defining factor regarding the board is that they comprise the very few people with ready access to very large quantities of narcotics and simultaneous access to the necessary funding.

Risk is alleviated through the concept of share trading⁸. Investors decide how many 'shares' they wish to take on personally as an investment in the importation. For example, they may wish to 'buy' 20 shares in terms of dollars or units of drugs. They will provide 20 per cent of the funding and receive 20 per cent of the profits. The capital expenditure risk is also limited to 20 per cent. If the importation is seized before delivery then the costs may be written off. The investors will still expect payment if a seizure occurs after delivery. Credit is not usually extended (but can be at some levels of the operational chain to spread costs and risks) as the loss of an importation is likely to result in default of payments. The sunk costs of an importation may be in the tens of millions and non payment of debts are

treated very seriously. Within the syndicates discussed in this paper, the preferred option for payment defaults is kidnapping pending debt acquittal⁹. At the very least defaults will lead to the end of an otherwise profitable business relationship.

An obvious vulnerability here is the absolute reliance (trust) on the other investors. It is not unknown for investors in need of money to on sell their shares to unwary or novice investors, multiple times. That is, they sell the same (say) 20 shares to six or seven others. The individual has made significant profit but now must ensure that the importation fails (usually by way of police seizure) or face the prospect of having to pay those multiple persons out of a single importation profit. Hence, information is passed to law enforcement, resulting in the loss of the product and the gain of a hefty profit¹⁰.

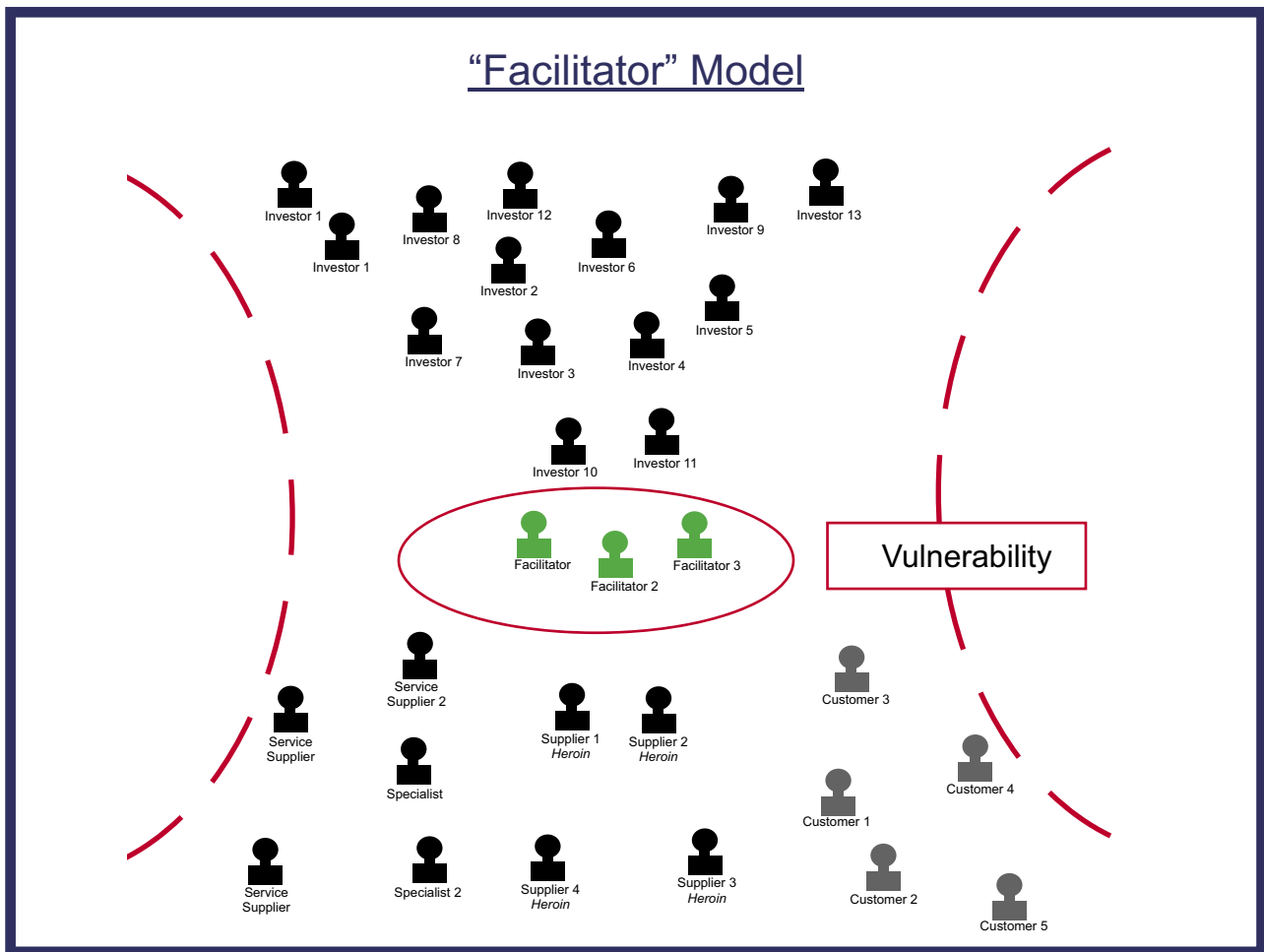
Investors are wary of unauthenticated purchase offers and are not likely to deal with anyone who requests an importation. However, some major and trusted distributors can request supply – almost taking on the role of 'instigator/investor'. The market is predominantly supply driven and the Investor can therefore deal exclusively with known 'clients' on a 'offer for sale' basis. Drugs are stockpiled in country, or at transshipment locations and certain amounts may be offered to trusted purchasers¹¹.

These and other reasons support the development towards more extensive use of highly skilled and specialised facilitators by drug syndicates. The facilitator is usually expected to invest in the importation being facilitated but may also be paid on a fee for service basis. In either case, he is known to be reliable and trustworthy. The board may run multiple concomitant importations (or other criminal activities) to various destinations and may use more than one facilitator for different importations.

Facilitators are known personally by one or more investors who, in essence, warrant the reliability of that person. The facilitator arranges all aspects of the importation short of the quantities, delivery location and prices. In the context of an importation of narcotics from Asia to Australia (the project) the facilitator may organise the concealment, storage, transport, security, communications, distribution, funds repatriation and personnel functions, through historical expertise and connections/networks. In simple terms, the facilitator will subcontract out the various functions of an importation to known, trusted specialists¹². Depending on the function, legitimate business may be employed unknowingly to undertake some of the required activities or to supply some of the equipment or services. The facilitator is the organiser of the interrelated components.

Often, the facilitator has particular expertise in organising the requirements for a specific importation at very short notice – a 'just in time' production model of sorts. This ability is highly valued as a security measure. For instance, a company can be set up, complete with a real office/building, and operating bank accounts

Figure 1 gives a pictorial representation of the main components within the facilitator model¹⁶



within a few days. This would be very difficult to do overtly by legitimate businesses let alone covertly. The rapidity of business entity creation makes intelligence gathering by law enforcement, before the fact, quite difficult but can also be seen as a potential vulnerability. The particular pattern of business creation may be indicative of imminent criminal behaviour involving an importation of drugs.

There are also very obvious business efficiencies in utilising the services of a person that can arrange all requirements and produce positive outcomes in a flexible, low cost and fast manner.

The facilitator is the coordination point for drug syndicate importations. He has the knowledge of the 'operational' networks, the skill sets, the locations and the interrelationships required for successful importations. The facilitator is also a key figure for security compartmentalisation. The investors have no tactical knowledge of the particular importation. They set the strategic parameters (eg have 200 units of heroin within the possession of this person/ at that location by this date). The facilitator decides the tactical issues relevant to making the importation successful. This may include consideration of novel concealment methods, the use of specialists

for particular components and the extent to which legitimate businesses may be involved.

The functional or geographical 'business units' that undertake the components of the project may be individuals or organisations in their own right. The organisations will have their own structures, governance mechanisms and operating procedures, with no reference to the investors. They are selected by the facilitator with regard to their suitability for a particular project and are unlikely to even know of the board's existence. There is an increasing trend towards specialisation, particularly in relation to critical issues such as security, communication and concealment. (See Figure 1)

Research first conducted in 1998 (and regularly updated) by the AFP Transnational Crime Coordination Centre (TCCC) has provided important information surrounding drug importation syndicates supplying significant quantities of illicit drugs to Australia.

This information included:

- The first real identification of the ‘facilitator’ model for importations
- Evidence on increased use of specialists for particular functions.
- Evidence of cooperative law enforcement causing major changes to syndicate importation methods (move base of operations to ‘safer’ third countries and off shore stockpiling and distribution)
- Confirmation of broad spectrum of syndicate structures –hierarchical to loose associations
- Confirmation of ethnic, familial and geographic binding factors – but these factors are not exclusive
- Strong compartmentalisation and evidence of the criticality of trust, particularly in relation to forming external associations
- Evidence of structural depth and redundancy in operations – ability to overcome short term setbacks.
- Evidence of a broad range of criminal activity and methods of operation.
- Evidence of the use of legitimate business for purposes ranging from directly supporting criminal activity (including money laundering, security, communications and transport) through to convenience for secure meetings.
- Evidence of entry/infiltration by criminal syndicates into industries conducive to the criminal activity – for example: telecommunication, travel.
- Strong evidence that heroin importations are principally supply driven – therefore financed and organised outside Australia.
- Evidence of highly skilled and experienced specialists (facilitators) able to work under extreme timetables (approaching “just in time” style delivery)
- Evidence of active counter law enforcement strategies being employed and an understanding of police methods. (Some are, in fact, ex police officers).
- Evidence of a trend towards polycrime.
- Primary distributors live off shore.
- Only few people have access to very large quantities of narcotics.

Vulnerabilities observed included:

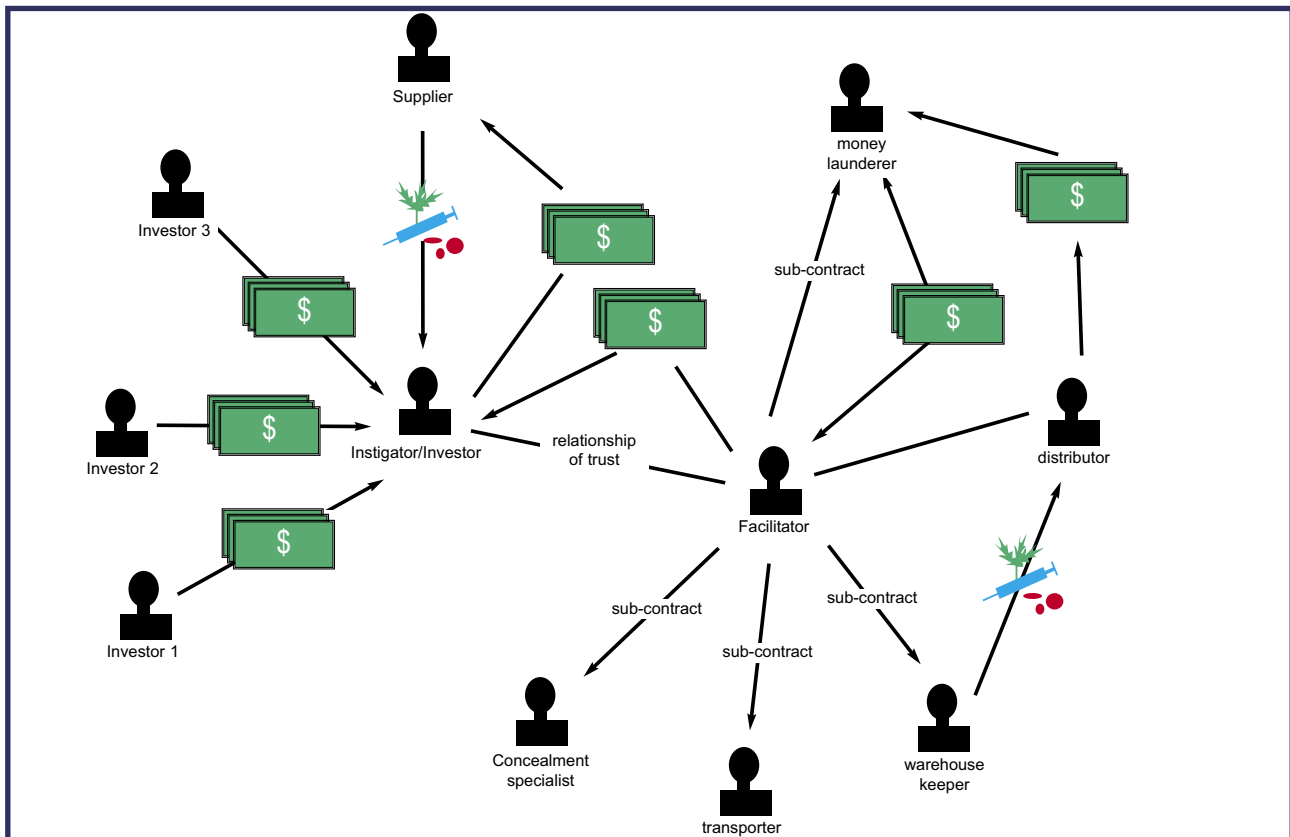
- Susceptibility to specific law enforcement strategies as evidenced, for example, through the transfer of operating bases to safer locations.
- Particular patterns of legitimate business activity (communications) being strongly indicative of criminal behaviour and with timing implications.
- The use of specialists may require the use of common language (English) and financial records (expenditure acquittal)
- Just in time importations require very tight scheduling tolerances.
- There are critical trust relationships between individual investors, investors and facilitators and facilitators and specialists.

The research will expand on the valuable insights provided by the TCCC to increase our knowledge of the vulnerabilities associated with the activities of drug syndicates. Initial analysis will be directed at the factors described in Figure 1 to determine those likely to return the most value for applied research. At the end of the chain, the research will provide law enforcement with a supportive set of critical vulnerabilities for investigation. The information provided through the TCCC research has strongly indicated a continuing move by drug syndicates to parallel some legitimate business practices. Evidence of the practicality of targeting these businesses activities is provided through the drug syndicate’s behaviours, including:

- A conscious move to alternative commodities that are less socially unacceptable, provide lesser penalties and may have production advantages – eg heroin to methamphetamine
- Use of standardised methods of operation.
- Increasing reliance on intelligence – effective transshipment and stockpiling countries, taking account of suitability, size and local cultures and police capabilities.
- Confirmed move to efficiency – marginal costs associated with alternative importation methods and sources; Setting up new structures – just in time.
- Increasing attempts to acquire business information – including corruption and infiltration of law enforcement.
- Using existing companies, taking advantage of existing infrastructure and operating history.

The investigations that have provided the bulk of the intelligence, synthesised for security purposes, discussed within this paper are represented graphically in Figure 2. This syzygistic amalgam of various importations illustrates the fundamental relationships within the facilitator model. The importations individually utilised various subsets of suppliers, investors and distributors (recipients) as well as two different facilitators (and networks).

Figure 2 Adapted from National Targeting Heroin Team Material ¹⁷



The choices made by the syndicate networks are dependent on many factors, including those raised throughout this paper. Key decision points include; the likelihood of success (including risk management and return on investment) of individual importations, the applicability and suitability of the method/networks to the organisational goals and structures, and the long-term viability of the network itself.

Conclusion

The research on analysis of the drug syndicate 'business entity' is in the early stages. Current investigational techniques include analysis of some business factors associated with drug syndicates. Continuing research is likely to clarify those factors that are most likely to be developed into exploitable vulnerabilities.

- What are the key organisational success and failure parameters for organisations?
- What are the relevant organisational structures?
- What are the key economic variables associated with successful economic activity; including utility maximisation, fixed and marginal costs, market share, growth and profit?
- What are the organisational structures, markets, motivations and other key attributes? Are they similar in all cases? What causes any differences?

We do not yet know the answer to these and other questions but have embarked on a 'voyage of discovery'. The outcomes from the research are not intended as a replacement for current law enforcement techniques, but simply as an additional tool to assist the accrual of societal benefit (through harm minimisation and criminal activity disruption).

The research model suggests that specific drug syndicates:

- act in similar ways to non criminal organisations in economic and business contexts; and/or
- act in different, measurable ways.

If the former is true then they should have similar vulnerabilities to those inherent in non criminal organisations and could be targeted accordingly. If the latter is true then it may be possible to use the measured differences as indicators of criminal activity. Both the economic vulnerability and the criminal indicators could be used for targeting criminal organisations. Police and other agencies may be able to reduce the incidence of particular

offences, reduce the impact of the offences on society and increase the effectiveness of law enforcement.

To take the proposition one step further, if we have valid data on the vulnerability of criminal enterprises based on key indicators and we can predict the likely actions of criminal enterprises, established through repeatable, observable measurements, then it may be possible to repeatedly target those criminal enterprises. That is to say, we may be able to force them to make a rational economic decision to exit from a particular market, not by arresting personnel, but by making the environment in which they operate less tenable or valuable. Any shift to alternative markets will, by definition, accrue lower utility than was previously the case (or the syndicate would have already been operating in that market) with commensurate societal benefits being made available.

From an economic perspective, should the marginal cost associated with running a criminal syndicate increase significantly or the marginal returns decline, then incentives to enter or remain in that market will decline¹⁸. The extent of adverse effect on drug syndicates may range between minimal (organisations adapting sufficiently to overcome the new environment) through to significant (forced changes in operating practices leading to lower effectiveness or even voluntary exit from high risk/return criminal markets, that also incur high societal harm, to lower risk / damage markets).

In either case, you cannot manage what you cannot measure meaning the concept is worthy of ongoing research.

Footnotes

- 1 Source: AFP Annual Report 2002—03
- 2 Operation Avian Intelligence
- 3 AFP informant information
- 4 The AFP Vision and Mission statements are intentionally non prescriptive. They emphasise flexibility and outcomes rather than narrowly defined success metrics.
Vision: To fight crime together and win.
Mission: To provide dynamic and effective law enforcement to the people of Australia.
- 5 Based on survey background research conducted by David L. Carter, Ph.D., (International Organized Crime – School of Criminal Justice, Michigan University, 2001).
- 6 AFP terminology
- 7 Source: AFP Intelligence – TCCC National Targeting Heroin Team
- 8 Source: AFP Intelligence – TCCC National Targeting Heroin Team – Share trading concept
- 9 Source: AFP Intelligence – TCCC National Targeting Heroin Team
- 10 Source: AFP Informant debrief – TCCC National Targeting Heroin Team
- 11 Source: AFP Intelligence – TCCC National Targeting Heroin Team – Secure relationships
- 12 Source: AFP Informant debrief – use of specialist personnel for funds repatriation (and other functions)
- 13 Source: AFP Intelligence – TCCC National Targeting Heroin Team
- 14 Source: AFP Intelligence – TCCC National Targeting Heroin Team
- 15 Source: AFP Intelligence – TCCC National Targeting Heroin Team
- 16 Adapted from TCCC material
- 17 Source: TCCC – National Targeting Heroin Team
- 18 These marginal costs can be affected through various means, including regulation of industries used by, but not part of the criminal syndicate. A contemporary example of this is the additional security requirements associated with travel and cargo. The regulation, intended primarily as a counter terrorism measure, will also have significant impact on drug couriers and drug cargos. Drug syndicates will need to adapt to the new environment, incurring additional costs and potentially having additional shipments seized by law enforcement. There is also the flow on effect that the circle of trust between players is degraded.