



The Obvious “Stone left unturned”

Waking up – to our collective “Call-to-Action”

I've had several conversations with good friends from large communication providers, who expressed frustration with some requests for assistance from the FBI (and a couple other agencies), which lead to my reflection on some key “Lessons Learned” from the past. Such as:

Fundamentals Re: Complex – Often Larger Organized Criminal Groups:

Through most of my career in the FBI (and since) most significant crimes -or cases (at least to Law Enforcement & prosecutors) never showed up “gift wrapped” so-to-speak- on the doorsteps of the FBI (or other agencies) ready for prosecution.

In fact, most good cases were identified via good sources of “intel” ie...through well-placed informants, cooperating witnesses (with leverage) or in many-recent cases through inspired Subject Matter Experts (SMEs) from cross-sector partners we increasingly relied on.

We (in current & former L.E) should be very mindful of this fundamental truth, including a few well-deserved criticisms from private industry (major victims), such as:

***If this sounds at-all like what you do or say, take a deep breath and clear your head, PLEASE!*

When contacting the local Field Office, victims (people & organizations) were told:

- The case that they shared was not large enough to interest the prosecutors, or
- The case should be referred to another Field Office, where the company was located, (and that this matter is not in our Area of Responsibility {AOR}) or
- That you (the victim company) did not specifically detail what the loss \$\$ amount was or,
- Since the “bad-guys” were at least in-part overseas, the likelihood of prosecution or recovery - was very low. or,
- The fraud described does not appear to be tied to Terrorism or Organized Crime, and as such is not really a “Top Priority”

** Embracing this history (**& hoping to not repeat the past**) – We’ve advanced more than 15 impactful initiatives through collaboration with our law enforcement partners, the FBI’s IC3, CIRFU (the International Task Force {ITF}) and the NCFTA that, among other things:

- 1) Developed a pool of inspired resources (newly trained & via critical SME partners) demonstrating they could:
 - Build actionable intelligence packages regarding known (and yet to be identified) threat actors and associates, that can be referred to L.E for further action.
 - Identify areas of exploitation targeted by criminal groups tied to new technologies employed by US & International private sector organizations to sell/market products & services.
 - Identify noteworthy anomalies in behavior of criminals as those exploited areas were identified, and
 - Build sets of “early warning” identifiers regarding this behavior.
 - In coordination with L.E partners, establish non-attributable on-line resources to expand collection of intelligence regarding new/evolving criminal schemes.
 - Connect “The Dots” of conduct and relationships that may in fact be tied to Terrorist Financing and/or international Organized Crime, and
 - Refined the process for building new initiatives with similar outcomes.
- 2) Create a Call to Action: Where we respectfully “sound the alarm” of not repeating the steps we **KNOW WILL NOT WORK**, and dust off the proven processes that do, repeating/revising each as needed, and work with our common goals in mind?



More often than we think, the “Stone left unturned” **is right at our feet.**