

April 2010

# COMBATING GANGS

## Federal Agencies Have Implemented a Central American Gang Strategy, but Could Strengthen Oversight and Measurement of Efforts



GAO

Accountability \* Integrity \* Reliability



Highlights of [GAO-10-395](#), a report to congressional requesters

## Why GAO Did This Study

Thousands of gang members in the United States belong to gangs such as MS-13 and 18th Street that are also active in Central American countries. Federal entities with responsibilities for addressing Central American gangs include the National Security Council (NSC); the Departments of Homeland Security (DHS), Justice (DOJ), and State; and the U.S. Agency for International Development (USAID). GAO was asked to review federal efforts to combat transnational gangs. This report addresses (1) the extent to which the federal government has developed a strategy to combat these gangs, and (2) how federal agencies have implemented the strategy and other programs to combat these gangs, coordinated their actions, and assessed their results. GAO examined federal agencies' antigang plans, resources, and measures; interviewed federal, state, and local officials in seven localities representing varying population sizes and geographic regions; and interviewed U.S. and foreign officials in El Salvador and Guatemala where U.S. agencies have implemented antigang programs. The results of these interviews are not generalizable.

## What GAO Recommends

GAO recommends that the NSC revise the antigang strategy to include an approach for oversight and performance measures and that DOJ and DHS reach agreement on the composition of an antigang unit in El Salvador. The NSC did not comment. DOJ and DHS agreed with our recommendation to them.

[View GAO-10-395 or key components.](#)  
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# COMBATING GANGS

## Federal Agencies Have Implemented a Central American Gang Strategy, but Could Strengthen Oversight and Measurement of Efforts

### What GAO Found

The NSC, in conjunction with State, DOJ, DHS, and USAID, developed a strategy to combat gangs with connections to Central America; however, the strategy lacks an approach or framework to oversee implementation and performance goals and measures to assess progress. GAO previously reported that characteristics such as defining the problem to be addressed as well as the scope and methodology of the strategy; describing agencies' activities, roles, and responsibilities; providing an approach to oversee implementation; and establishing performance measures, among other characteristics, can enhance a strategy's effectiveness. While the antigang strategy contains some of these characteristics, such as identifying the problems and risks associated with the gangs, describing the scope and purpose of the strategy, and defining roles and responsibilities of federal agencies as well as specific implementation activities, it lacks other characteristics such as an approach for overseeing implementation and goals and measures for assessing progress. For example, although agencies coordinate the strategy's implementation through an interagency task force, agency officials reported that this task force does not oversee the strategy's implementation and that no entity exercises oversight responsibility for the strategy's implementation. Similarly, while State and USAID are developing measures to assess the outcomes of their antigang programs, these measures do not encompass all programs under the strategy or track results of the strategy as a whole. Incorporating these characteristics could enhance the accountability of agencies to implement the strategy and provide a means for assessing progress.

To carry out the strategy and combat transnational gangs, federal agencies have implemented programs and taken steps to coordinate their actions and develop performance measures to assess results of individual programs; but, coordination could be strengthened in an antigang unit in El Salvador by reaching agreement on Immigration and Customs Enforcement's (ICE) role in the unit, the only such unit currently in Central America. Agencies use various interagency groups to coordinate with each other, such as DOJ's Anti-gang Coordination Committee. However, improved coordination at the FBI-initiated antigang unit in El Salvador could enhance information sharing. While the FBI requests information directly from Salvadoran police, ICE requests go to its country attaché, then to FBI agents at the unit who pass it on to Salvadoran police, as ICE does not have an agent at the unit. Prior GAO work has shown that agencies should facilitate information sharing and look for opportunities to leverage resources. Although FBI and ICE officials agree that the process could be improved by posting an ICE agent at the unit and have been discussing the possibility since 2008, they have not yet reached agreement on ICE's role. By reaching agreement, the FBI and ICE could strengthen coordination and information sharing. While agencies have established measures to assess programs, as some of the programs are just starting, data collection for many measures is in the early stages.

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## Abbreviations

ATF	Bureau of Alcohol, Tobacco, Firearms, and Explosives
BOP	Federal Bureau of Prisons
CARSI	Central American Regional Security Initiative
CBP	U.S. Customs and Border Protection
DEA	Drug Enforcement Administration
DHS	Department of Homeland Security
DOD	Department of Defense
DOJ	Department of Justice
EOUSA	Executive Office for U.S. Attorneys
FBI	Federal Bureau of Investigation
GangTECC	National Gang Targeting, Enforcement, and Coordination Center
ICE	U.S. Immigration and Customs Enforcement
INTERPOL	International Criminal Police Organization
IOCPCC	International Organized Crime Policy Coordinating Committee
MS-13	Mara Salvatrucha
NDIC	National Drug Intelligence Center
NGIC	National Gang Intelligence Center
NSC	National Security Council
OMG	outlaw motorcycle gang
SOUTHCOM	U.S. Southern Command
State	Department of State
the Strategy	Strategy to Combat the Threat of Criminal Gangs from Central America and Mexico
TAG	Transnational Anti-Gang unit
Treasury	Department of the Treasury
USAID	U.S. Agency for International Development
USAO	U.S. Attorneys' Offices
USMS	U.S. Marshals Service

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United States Government Accountability Office  
Washington, DC 20548

April 23, 2010

The Honorable Lamar S. Smith  
Ranking Member  
Committee on the Judiciary  
House of Representatives

The Honorable Dianne Feinstein  
United States Senate

According to the 2009 National Gang Threat Assessment by the National Gang Intelligence Center (NGIC) and National Drug Intelligence Center (NDIC), as of September 2008, there were approximately 1 million gang members in the United States—a 25 percent increase over 2005 membership levels.<sup>1</sup> The assessment found that street gangs that operate throughout most of the United States are a significant threat that has become magnified as national- and regional-level street gangs migrate from urban areas to suburban and rural communities. According to the assessment, gang members engage in a host of criminal activities such as homicide, extortion, drug distribution, and other crimes. Gangs such as the Latin Kings, the Jamaican Posse, Mara Salvatrucha (MS-13), and 18th Street, as well as outlaw motorcycle gangs like the Hells Angels, have been identified by federal law enforcement officials as transnational gangs—gangs whose members are present in and criminally active in more than one country. Of these, gangs with ties to Central America such as MS-13 and 18th Street have been specifically identified as posing serious threats to the public safety of communities in the United States and in Central

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<sup>1</sup>National Gang Intelligence Center and National Drug Intelligence Center, *2009 National Gang Threat Assessment* (Washington, D.C.: January 2009). The *2009 National Gang Threat Assessment* is a collaborative effort between the NGIC and the NDIC to examine the threat posed to the United States by criminal gangs. The assessment is based on federal, state, and local law enforcement information and is supplemented by information retrieved from open sources. Information and data used for that report were collected through September 2008. The NGIC is a multiagency effort that integrates the gang intelligence assets of federal, state, and local law enforcement entities to serve as a centralized intelligence resource for gang information and analytical support. The NDIC was established by the Department of Defense Appropriations Act, 1993, Pub. L. No. 102-396, § 9078, 106 Stat. 1876, 1919 (1992). Placed under the direction and control of the Attorney General, NDIC was established to “coordinate and consolidate drug intelligence from all national security and law enforcement agencies, and produce information regarding the structure, membership, finances, communications, and activities of drug trafficking organizations.” *Id.*

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American countries due to their extremely violent nature, the breadth of their criminal activities, and their rapid expansion.<sup>2</sup> Our report focuses primarily on U.S. federal agencies' efforts to combat these gangs with ties to Central America.

A wide variety of federal departments and agencies have responsibilities for addressing the issue of gangs with ties to Central America, including the Departments of Justice (DOJ), Homeland Security (DHS), State (State), and Defense (DOD), and the U.S. Agency for International Development (USAID). Under the auspices of the National Security Council's (NSC) International Organized Crime Policy Coordinating Committee (IOCPCC),<sup>3</sup> these departments and agencies have collaboratively developed an interagency strategy to combat the threat of criminal gangs with connections to Central America and Mexico. In addition, these departments and agencies work together and with Central American countries and nongovernmental organizations to, among other things, exchange information for use in investigating gang crime, remove gang members who are illegally residing in the United States, and support programs to help prevent young people from becoming gang members or to intervene to provide at-risk youth with alternatives to being part of a gang. In July 2009 we reported on federal efforts to combat gang crime within the United States and coordination mechanisms among federal, state, and local agencies for domestic-based antigang efforts.<sup>4</sup> We discuss the status of our July 2009 recommendations relevant to transnational gangs later in this report.

You asked us to examine the extent to which U.S. federal agencies have taken steps to address the problem of transnational gangs. This report focuses on U.S. federal agencies' efforts to combat Central American gangs, addressing the following questions: (1) To what extent has the U.S. federal government developed a strategy to combat transnational gangs with connections to Central America? and (2) How have U.S. federal

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<sup>2</sup>MS-13 and 18th Street are Hispanic street gangs with members in both the United States and Central American countries. Throughout this report, we refer to "transnational gangs" as those gangs in the United States with connections to Central America. Appendix I provides additional information on MS-13 and 18th Street.

<sup>3</sup>The IOCPCC is an interagency committee of the NSC made up of various departments and agencies of the federal government such as DOJ, DHS, State, DOD, and USAID.

<sup>4</sup>GAO, *Combating Gangs: Better Coordination and Performance Measurement Would Help Clarify Roles of Federal Agencies and Strengthen Assessment of Efforts*, GAO-09-708 (Washington, D.C.: July 24, 2009).

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agencies implemented this strategy and related programs to combat transnational gangs with connections to Central America, and to what extent have federal agencies coordinated these programs and assessed their results? In addition, we provide information on the leadership structure and transnational criminal activities of MS-13 and 18th Street (see app. I) and other U.S. gangs that federal law enforcement agencies have identified as having transnational connections (see app. II). We also provide additional details on federal programs for combating transnational gangs (see app. III) and federal antigang coordinating mechanisms and entities (see app. IV).

To determine to what extent the U.S. federal government has developed a strategy to combat transnational gangs with connections to Central America, we examined the interagency strategy developed by various federal departments and agencies under the auspices of the NSC, called the Strategy to Combat the Threat of Criminal Gangs from Central America and Mexico (the Strategy), and compared the contents of the strategy to select criteria in our prior work on desirable characteristics of an effective national strategy, including (1) clear purpose, scope, and methodology; (2) discussion of problems, risks, and threats; (3) desired goals, objectives, activities, and performance measures; and (4) delineation of roles and responsibilities.<sup>5</sup> We also examined the roles and activities of the various federal departments and agencies under the Strategy, including DOJ, DHS, State, DOD, the Department of the Treasury (Treasury), and USAID, and their component agencies, such as the Federal Bureau of Investigation (FBI) within DOJ and U.S. Immigration and Customs Enforcement (ICE) within DHS, that are responsible for carrying out efforts under the Strategy. In regard to the NSC, we discussed its role in developing and implementing the Strategy with a mix of the departments and agencies that participated in the NSC's IOCPCC such as State, DOJ, and USAID.

To determine how U.S. federal agencies have implemented programs to carry out the Strategy and combat transnational gangs, coordinated these programs and assessed their results, we examined a mix of DOJ's, DHS's, State's, USAID's, and their component agencies' plans, performance data, reports, and assessments for fiscal years 2006 through 2009. We compared

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<sup>5</sup>GAO, *Combating Terrorism: Evaluation of Selected Characteristics in National Strategies Related to Terrorism*, [GAO-04-408T](#) (Washington, D.C.: Feb. 3, 2004), and GAO, *Rebuilding Iraq: More Comprehensive National Strategy Needed to Help Achieve U.S. Goals*, [GAO-06-788](#) (Washington, D.C.: July 11, 2006).

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federal agencies' efforts to coordinate and share information on their transnational antigang programs to select criteria on effective interagency collaboration and results-oriented government.<sup>6</sup> In addition, we reviewed federal agencies' budget requests for fiscal years 2008 through 2010; appropriations acts for DOJ, DHS, State, and USAID and supplemental appropriations acts for those fiscal years; and expenditure plans for U.S. provision of antigang assistance to countries in Central America. To assess the reliability of statistical information, such as data on performance and outcomes, we discussed the sources of the data with agency officials and reviewed documentation regarding the compilation of data. We determined that the data were sufficiently reliable for the purposes of this report. To obtain information on federal efforts to combat the gangs as well as the extent to which agencies have coordinated their efforts with other agencies, we interviewed a mix of federal, state, and local law enforcement officials in seven locations in the United States as well as a mix of officials from U.S. federal, foreign, and three nongovernmental agencies in El Salvador and Guatemala. The locations we selected were based on a mix of criteria that included locations (1) along the U.S. borders; (2) where U.S. federal agencies have implemented antigang programs; and (3) where federal law enforcement agencies have conducted operations involving gangs with connections to Central America. For our site visits to foreign locations, we consulted with officials of federal agencies to identify in which foreign locations their agencies had efforts underway. Of the countries in the region, agency officials suggested we visit El Salvador and Guatemala because more antigang initiatives were underway and further along compared to efforts in other countries. Given this, we selected these countries to obtain more information on these efforts and evaluate the effect they have had on the gang problem. To obtain information on the process of how ICE handles and removes gang members who are in the United States illegally, we visited ICE's South Texas Detention Facility in Pearsall, Texas, and interviewed officials with ICE's Office of Detention and Removal Operations. We also observed activities related to gang prevention efforts in El Salvador and Guatemala, such as those at the youth centers, and interviewed participants, local government officials involved in the efforts, and members of the community about their views of the programs and the programs' effect. The information we obtained from interviewing officials in the U.S. and Central American locations cannot be generalized across

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<sup>6</sup>GAO, *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005).

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all locations in the United States or Central America. However, because we selected these locations based on a variety of factors, they provided us with an overview of the agencies' antigang programs, examples of coordination and measurements to assess results, and any challenges with implementation of the programs. Additional details on our scope and methodology, including the locations we visited, are in appendix V.

We conducted this performance audit from April 2008 through April 2010, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

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### Overview of Gangs with Connections to Central America

Both the MS-13 and 18th Street gangs were formed in Los Angeles, California. MS-13 was founded by Salvadoran immigrants, many of whom came to the United States to escape the civil war in their native country in the 1980s. The 18th Street gang was founded primarily by Mexican immigrants in the 1960s, though it currently accepts members from other backgrounds. MS-13's early membership is reported to have included former guerrillas and Salvadoran government soldiers whose combat experience during the Salvadoran civil war contributed to the growth of the gang's notoriety as one of the more violent Los Angeles street gangs. The end of the Central American civil wars and changes in U.S. immigration laws helped to facilitate the removal of tens of thousands of Central Americans illegally in the United States to their native countries in the 1990s, including MS-13 and 18th Street gang members who subsequently spread their gang culture and operations to those countries.<sup>7</sup> MS-13 and 18th Street gang members removed from the United States to Central American countries established gangs in those countries.

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<sup>7</sup>The changes to immigration laws were included in two major pieces of legislation passed in 1996: The Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104-208, Div. C, 110 Stat. 3009-546 and the Antiterrorism and Effective Death Penalty Act of 1996, Pub. L. No. 104-132, 110 Stat. 1214. These laws expanded the offenses that constitute an "aggravated felony" rendering a noncitizen removable, and contracted available avenues of relief from removal.

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Within the United States, NGIC has reported that MS-13 has between 8,000 and 10,000 members nationally. The FBI has reported that MS-13 operates in at least 42 states and the District of Columbia. Traditionally, in the United States, MS-13 has consisted of loosely affiliated groups; however, law enforcement officials have reported the coordination of criminal activity among MS-13 gang members operating in the Atlanta, Dallas, Los Angeles, New York, and Washington, D.C., metropolitan areas. In the 2009 National Gang Threat Assessment, the NGIC and NDIC indicated that MS-13 members have been involved in a wide range of crimes within U.S. communities, including homicide, drive-by shootings, assault, robbery, weapons trafficking, the transportation and distribution of drugs, identity theft, and prostitution operations. The 18th Street gang is active in 28 states and has a membership estimated at between 30,000 and 50,000. According to the 2009 National Gang Threat Assessment, in California, for example, about 80 percent of 18th Street gang members are illegal aliens from Mexico and Central America. In the United States, 18th Street gang members have been involved in homicide, assault, robbery, street-level drug distribution, auto theft, and identification fraud.

Although estimates vary, in the Central American countries of El Salvador, Honduras, Nicaragua, and Guatemala, USAID has estimated that there are approximately 63,000 gang members,<sup>8</sup> while the U.S. Southern Command (SOUTHCOM) has estimated total gang membership in Central America to be approximately 70,000.<sup>9</sup> According to USAID, the majority of these members belong to MS-13 and 18th Street. Within Central American countries, these gangs engage in a range of criminal and violent acts, including homicide, kidnapping, drug smuggling, and extortion, among other crimes.

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## Overview of Federal Agencies' Missions and Roles in Combating Transnational Gangs

The NSC is the President's principal forum for considering national security and foreign policy matters with his senior national security advisors and cabinet officials. The council also serves as the President's principal arm for coordinating these policies among various government agencies. As such, under its IOCPCC, the NSC coordinated with other

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<sup>8</sup>USAID, *Central America and Mexico Gang Assessment* (April 2006).

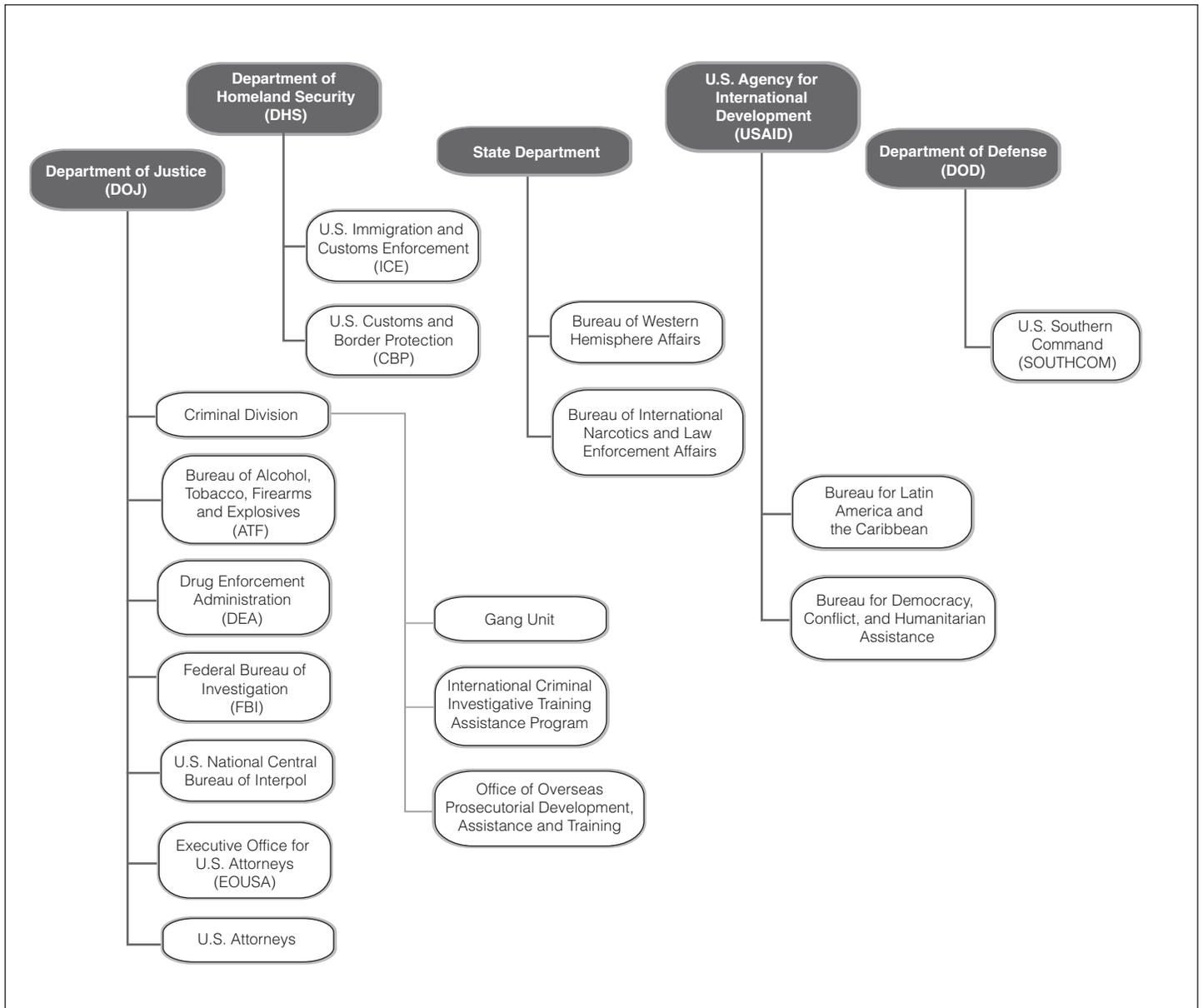
<sup>9</sup>SOUTHCOM is 1 of 10 unified combatant commands in DOD. It is responsible for providing contingency planning, operations, and security cooperation for Central and South America, the Caribbean (except U.S. commonwealths, territories, and possessions), and Cuba as well as for the force protection of U.S. military resources at these locations.

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federal departments and agencies to develop a strategy to combat the threat of criminal gangs from Central America.

Various other federal departments and agencies play key roles in U.S. federal government efforts to address transnational gangs. As shown in figure 1, these departments include DOJ, DHS, State, USAID, and DOD.

**Figure 1: Federal Departments and Agencies with Key Roles in Combating Transnational Gangs**



Source: GAO analysis of DOJ, DHS, State, USAID, and DOD information.

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## DOJ Component Agencies' Roles and Responsibilities for Combating Transnational Gangs

Within DOJ, seven components have key roles in law enforcement efforts to combat transnational gangs—the Criminal Division; the 93 U.S. Attorneys in 94 judicial districts across the nation that operate with administrative and operational support from the Executive Office for U.S. Attorneys (EOUSA); and four law enforcement agencies—the FBI; Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF); Drug Enforcement Administration (DEA); and U.S. National Central Bureau of Interpol.<sup>10</sup> The Criminal Division, along with the U.S. Attorneys, is charged with enforcing most federal criminal laws and can prosecute a wide range of criminal matters, including those involving transnational gangs and gang members.<sup>11</sup> The Criminal Division's International Criminal Investigative Training Assistance Program<sup>12</sup> and Office of Overseas Prosecutorial Development, Assistance and Training<sup>13</sup> have been involved in providing antigang training for law enforcement officials and prosecutors from Central America. Also part of the Criminal Division is the Gang Unit, a specialized group of prosecutors charged with developing and implementing strategies to address gangs. In addition to prosecuting gang cases, the Gang Unit prosecutors assist U.S. Attorneys on legal issues and multidistrict cases, as well as work with domestic and foreign law enforcement to coordinate enforcement strategies. The 93 U.S. Attorneys prosecute the majority of criminal cases as well as civil litigation handled by DOJ. EOUSA provides general executive assistance and guidance to U.S. Attorneys' Offices (USAO) and has a national gang coordinator who acts as a liaison between the USAOs and other DOJ components involved

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<sup>10</sup>The same U.S. Attorney serves the District of Guam and the District of the Commonwealth of the Northern Mariana Islands.

<sup>11</sup>Only federal laws specifically assigned to other divisions within DOJ are outside the purview of the Criminal Division. For example, a National Security Division was established in September 2006 with specific responsibility for international and domestic terrorism and other national security threats.

<sup>12</sup>The International Criminal Investigative Training Assistance Program was established in 1986 to help train police officers in Latin America. Its mission is to work with foreign governments around the world to develop professional and transparent law enforcement institutions that protect human rights, combat corruption, and reduce the threat of transnational crime and terrorism.

<sup>13</sup>The Office of Overseas Prosecutorial Development, Assistance and Training was established in 1991 to develop and administer technical assistance designed to enhance the capabilities of foreign justice-sector institutions and their law enforcement personnel to allow them to more effectively partner with DOJ in combating terrorism, trafficking in persons, organized crime, corruption, financial crimes, and other transnational crime.

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DHS Component Agencies'  
Roles and Responsibilities for  
Combating Transnational  
Gangs

in gang prosecution efforts.<sup>14</sup> The FBI's transnational gang efforts target violent crime and criminal enterprises associated with transnational gangs. ATF's primary involvement with MS-13 and 18th Street is related to gang members' illegal possession of, or trafficking in, firearms. DEA targets gangs in connection with specific drug sources or large-scale suppliers who distribute illicit drugs to the gangs. The U.S. National Central Bureau of Interpol is the point of contact for all International Criminal Police Organization (INTERPOL) matters in the United States, including secure communications with police authorities in INTERPOL member countries.<sup>15</sup> As such, among other things, the National Central Bureau receives and sends out notices to INTERPOL bureaus in other countries concerning information or the location of gang members or suspects involved in gang activities.

Within DHS, ICE's Office of Investigations has a National Gang Unit that manages and coordinates national efforts to combat the growth and proliferation of transnational criminal street gangs. Gang members who are involved in crimes with a nexus to the border, or are foreign-born and are in the United States illegally may be subject to ICE's dual criminal and administrative authorities that are used to disrupt and dismantle transnational gang activities with criminal prosecutions and removal from the United States. In addition, U.S. Customs and Border Protection (CBP), the DHS component that protects U.S. borders against terrorism, illegal immigration, and drug smuggling, among other threats, has a role in identifying gang members at the borders. Upon the arrest of a suspected gang member, CBP will contact ICE and determine if enforcement action is to be taken by CBP or ICE based upon whether the apprehension took place between the ports of entry or at a port of entry. CBP has developed an Anti-Gang Initiative to improve the agency's awareness of gangs through increased partnerships with other federal agencies and to provide gang awareness training for its personnel.

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<sup>14</sup>EOUSA provides operational support for information technology, training, and other functions, and prepares an annual statistical report of U.S. Attorneys, among other functions.

<sup>15</sup>INTERPOL is the world's largest international police organization, with 188 member countries. Created in 1923, it facilitates cross-border police cooperation, and supports and assists all organizations, authorities, and services whose mission is to prevent or combat international crime.

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## State and USAID Bureaus' Roles and Responsibilities for Combating Transnational Gangs

Two State bureaus, the Bureau of Western Hemisphere Affairs and the Bureau of International Narcotics and Law Enforcement Affairs, are involved in efforts to address gang violence in Central America. The Bureau of Western Hemisphere Affairs is responsible for managing and promoting U.S. interests in the region and fostering cooperation on issues such as drug trafficking and crime. The Bureau of International Narcotics and Law Enforcement Affairs advises the U.S. government on the development of policies and programs to combat narcotics and crime, and works with host nations to strengthen their capabilities so that they can bolster their own effectiveness in fighting drug trafficking and crime including transnational gangs.

USAID provides economic, development, and humanitarian assistance to other countries and, with respect to transnational gangs, is the primary agency responsible for managing gang intervention and prevention efforts in Central America.<sup>16</sup> These efforts are carried out principally through the agency's Bureau for Latin America and the Caribbean and missions in Central America, with technical assistance and support from the Democracy and Governance Office of the Bureau for Democracy, Conflict and Humanitarian Assistance. The agency works with foreign governments and local communities in Central America to support and implement a broad range of programs focused on, among other things, creating employment opportunities and alternatives to participating in gangs.

## DOD Roles and Responsibilities for Combating Transnational Gangs

DOD, and specifically SOUTHCOM, has tracked the growth of the gangs in the Central American countries that are within its area of responsibility. Although SOUTHCOM does not have any specific programs in place in Central America to combat transnational gangs, it monitors information on gangs that either pose a threat to the sovereignty of governments in the region or are involved in drug trafficking.

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## The Mérida Initiative

U.S.-sponsored antigang programs in Central America are being funded in part by the Mérida Initiative. This initiative was announced by the Bush Administration in October 2007 as a multinational effort to confront criminal organizations whose actions affect Mexico, Central America, and

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<sup>16</sup>Prevention refers to efforts to prevent, reduce, or minimize the incidence of gang activity and its negative consequences by dissuading at-risk youths from joining gangs. Intervention refers to efforts to support, encourage, and positively address the needs of individuals attempting to leave or who have left a gang, and may include efforts to persuade individuals to leave a gang.

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the Caribbean countries of the Dominican Republic and Haiti, and spill over into the United States.<sup>17</sup> Through this initiative, the U.S. federal government is providing equipment, training, and other assistance to help these countries address drug and arms trafficking, bulk cash smuggling, and other crime issues such as gangs and organized crime.<sup>18</sup> For Central America, funding under the Mérida Initiative is administered by State and has been allocated to various areas and efforts, including to combat transnational gangs, improve Central American countries' judicial systems, enhance airport and border security in the region, refurbish patrol boats used by Central American countries for intercepting drug traffickers in coastal waters, and a broad range of crime prevention programs, including programs directed at youth at-risk. In fiscal year 2008, the Supplemental Appropriations Act appropriated \$60 million for the Central American portion of the Mérida Initiative.<sup>19</sup> In fiscal year 2009, the 2009 Omnibus Appropriations Act appropriated \$105 million for Mérida Initiative activities in Central America.<sup>20</sup> Up to \$83 million was appropriated for Mérida Initiative activities in Central America for fiscal year 2010 by the Consolidated Appropriations Act, 2010.<sup>21</sup> We recently completed work

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<sup>17</sup>The initiative was named for the location of a March 2007 meeting between Presidents George W. Bush and Felipe Calderón of Mexico. The Mexican portion of the initiative is intended to complement U.S. and Mexican domestic efforts against drug, human, and weapons trafficking. Subsequently, Congress added funding for Haiti and the Dominican Republic to address concerns about increased drug trafficking in the Caribbean.

<sup>18</sup>State has identified the following four strategic goals for the Mérida Initiative: (1) break the power and impunity of criminal organizations; (2) assist the governments of Mexico and Central America in strengthening border, air, and maritime controls; (3) improve the capacity of justice systems in the region; and (4) curtail gang activity in Mexico and Central America and diminish demand for drugs in the region.

<sup>19</sup>Pub. L. No. 110-252, § 1407(a), 122 Stat. 2323, 2340. Amounts appropriated for Mérida activities include those appropriated “to combat drug trafficking and related violence and organized crime, and for judicial reform, institution building, anti-corruption, rule of law activities, and maritime security.” The act appropriated \$65 million for assistance for the countries of Central America, Haiti, and the Dominican Republic, of which \$2.5 million each was required to be made available for assistance to Haiti and the Dominican Republic.

<sup>20</sup>Pub. L. No. 111-8, § 7045(f), 123 Stat. 524, 887. Amounts appropriated for Mérida activities include those appropriated “to combat drug trafficking and related violence and organized crime, and for judicial reform, institution building, anti-corruption, rule of law activities, and maritime security.”

<sup>21</sup>Consolidated Appropriations Act, 2010, Pub. L. No. 111-117, § 7045(f), 123 Stat. 3934, 3374 (2009). Amounts appropriated for Mérida activities include those available “to combat drug trafficking and related violence and organized crime, and for judicial reform, institution building, anti-corruption, rule of law activities, and maritime security.” As described above, funds requested for Mérida activities were directed to be made available for CARSI. H.R. Rep. No. 111-366, at 1482 (2009) (Conf. Rep.).

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looking at the status of funds for the initiative and have work ongoing examining U.S. counternarcotics and anticrime assistance provided to Mexico under the initiative.<sup>22</sup> We plan to issue a report on this work later this year.

As of February 2010, federal agencies were developing a strategy for a regional security initiative in Central America, called the Central American Regional Security Initiative (CARSI). This new initiative is in accordance with direction in the conference report accompanying the Consolidated Appropriations Act, 2010, which removed the Central American portion from the Mérida Initiative and placed funding for Central American programs into the new CARSI.<sup>23</sup> Under this new initiative, Central American programs initially funded by the Mérida Initiative, including antigang programs under the Strategy, would be subsumed into CARSI. According to officials from State and USAID, the CARSI strategy is still under development and officials did not have an estimate as to when it would be completed.

In addition to funding provided under the Mérida Initiative, federal agencies have used funding from their operating accounts to implement antigang programs in Central America and the United States. For example, in fiscal years 2007 and 2008 the FBI funded \$200,000 and \$965,000 from its operating account for establishment of the Transnational Anti-Gang (TAG) unit in El Salvador and the operations of the MS-13 National Gang Task Force, an FBI task force that coordinates FBI-led investigations of MS-13 and 18th Street gangs, respectively. Further, ICE uses funding to conduct transnational gang investigations in the United States and abroad. According to ICE officials, \$20.4 million that Congress directed to be used for ICE's antigang activities in fiscal year 2008 funded 119 positions to expand ICE's efforts to combat transnational street gangs.<sup>24</sup> Additionally, USAID officials reported starting their gang prevention programs before Mérida Initiative funding became available and have used non-initiative

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<sup>22</sup>GAO, *Status of Funds for the Mérida Initiative*, [GAO-10-253R](#) (Washington, D.C.: Dec. 3, 2009).

<sup>23</sup>See H.R. Rep. No. 111-366, at 1482 (2009) (Conf. Rep.).

<sup>24</sup>See explanatory statement accompanying Consolidated Appropriations Act, 2008, Pub. L. No. 110-161, 121 Stat. 1844 (2007), at 1041 (noting that additional funding had been provided in the act "to enhance the unique Federal role ICE plays in investigating and disrupting organized transnational criminal gangs").

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resources to promote antigang and rule-of-law programs in Central America.

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## The Interagency Antigang Strategy Clarifies Roles and Specifies Agency Activities, but Lacks an Approach for Oversight and Comprehensive Measures to Assess Implementation Efforts

Various federal departments and agencies under the auspices of the NSC developed an interagency strategy for combating gangs with connections to Central America that defines the roles and responsibilities of federal agencies in carrying out the strategy, identifies the problems and risks associated with the gangs, defines its scope and purpose, and identifies specific activities to be taken to achieve results. However, it lacks other key characteristics, such as providing an approach or framework to include an entity for overseeing implementation, and goals and measures for assessing progress and performance in implementing the strategy.

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## The Antigang Strategy Identifies Roles, Responsibilities, and Activities for Federal Agencies in Combating Transnational Gangs

To respond to the threats criminal gangs such as MS-13 and 18th Street pose to the countries in which they operate, U.S. federal agencies developed the Strategy to Combat the Threat of Criminal Gangs from Central America and Mexico (the Strategy). Issued in July 2007,<sup>25</sup> this interagency strategy was developed under the auspices of the NSC's IOCPCC, comprised of representatives from various federal agencies, including State, DOJ, DHS, USAID, and DOD.<sup>26</sup> The Strategy is designed to combat the threat posed by gangs with links to Central America and Mexico by adopting an approach that integrates law enforcement with youth crime prevention and interventions that provide alternatives to gangs. The Strategy is also designed to be regional in scope, with the United States working with the other countries affected by the gangs to

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<sup>25</sup>The Strategy was announced at a July 2007 U.S.-Central American Integration System summit on security issues. The Central American Integration System is a regional entity created by Central American countries to promote regional integration. Among other things, one of the objectives of the system is to set up a new model of regional security and eradicate violence.

<sup>26</sup>According to State officials, U.S. embassies in Central America and Mexico and representatives from the Mexican and Central American governments also provided input to the development of the Strategy.

avoid transferring the gang problem to neighboring countries. To implement this approach, the Strategy includes five broad categories under which federal agencies are to take actions to combat transnational gangs—diplomacy, repatriation, law enforcement, capacity enhancement, and prevention—and identifies the activities for agencies to implement under each of these categories. As shown in table 1, for each category, the Strategy identifies agencies that are to implement the individual activities and a lead agency to coordinate these activities. Specifically, the Strategy identifies State as the lead agency for the diplomacy category and, along with USAID, the lead agency for the capacity enhancement category; DHS as the lead agency for the repatriation category and, along with DOJ, the lead agency for the law enforcement category; and USAID as the lead agency for the prevention category.

**Table 1: Categories Related to the Strategy to Combat the Threat of Criminal Gangs from Central America and Mexico and Corresponding Implementing Agencies**

Strategy category and description	Lead agency for the category	Example of activities identified under each category	Agency responsible for the activity
Diplomacy: Carry out diplomatic efforts with affected countries to establish a coordinated and comprehensive approach to the gang problem.	State	Work with multilateral organizations, including the Central American Integration System and the Organization of American States, to coordinate and support a regional strategy	State and USAID
		Pursue a policy of engagement with target countries, working with them to identify the best initiatives to pursue at any given time	State and USAID
Repatriation: Expedite the repatriation (removal) process of gang members and provide receiving countries with criminal history information of the gang members.	DHS	Expand the Electronic Travel Document <sup>a</sup> system to countries in the region as conditions permit	DHS
		Provide receiving countries with related information that could help facilitate the reintegration of individuals removed from the United States	DOJ and DHS
Law enforcement: Identify and exploit the gangs' vulnerabilities in order to disrupt their criminal activities and dismantle their criminal infrastructure.	DOJ and DHS	Develop effective channels for sharing intelligence and operational enforcement information pertinent to antigang activities	DOJ and DHS
		Deter and deny, through bilateral and multilateral law enforcement activities, the ability of criminal gangs to engage in transnational criminal activities or recruit new members	DOJ and DHS
Capacity enhancement: Strengthen the capacity of criminal justice systems in Central America and Mexico to identify, prosecute, and	State and USAID	Provide training and technical assistance to selected elements within the justice system in each country and support the development of regular channels of communication and cooperation among them	DOJ, DHS, State, and USAID

Strategy category and description	Lead agency for the category	Example of activities identified under each category	Agency responsible for the activity
incarcerate gang leaders and operatives, as well as seize and have them forfeit their assets.		Support community efforts to combat gang crime and violence in the region, including collaboration between law enforcement entities and communities	State, USAID, and DOJ
Prevention: Strengthen the capacity of governments, nongovernmental organizations, and communities to reduce gang activity by discouraging youth from joining gangs and providing rehabilitation and integration options for youth who leave gangs.	USAID	<p>Support efforts to provide rehabilitation and reintegration programs and services to individuals removed from the United States to prevent them from joining a criminal gang or continuing involvement with criminal gangs upon return</p> <p>Assist community-based organizations and local authorities to provide youth with productive alternatives to criminal gang activity or encourage them to leave gangs (e.g., job placement, vocational skills training / alternative education, drug rehabilitation)</p>	USAID, State, DOJ, and DHS

Source: Department of State.

Notes: Data are from the Strategy to Combat the Threat of Criminal Gangs from Central America and Mexico.

\*Under the Electronic Travel Document system, ICE electronically sends travel document applications to the consular officials of these countries who can then electronically sign and certify the documents stating that the countries will receive the illegal aliens to be removed. These documents are also available to ICE electronically. This program eliminates the need for consular officials to visit in person the individual awaiting removal from the United States before issuing documents, helping to reduce the amount of time it takes for ICE to receive travel documents from foreign countries and ultimately remove illegal aliens. The system has been implemented in El Salvador, Guatemala, and Honduras.

As part of our prior work on desirable characteristics of effective national strategies, we have reported that such strategies are the foundation for defining what agencies seek to accomplish.<sup>27</sup> As such, we found that having characteristics like a description of agencies' activities, roles, and responsibilities as part of a strategy helps to enhance the strategy's effectiveness. Strategies that include characteristics such as these provide

<sup>27</sup> [GAO-04-408T](#) and [GAO-06-788](#).

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policymakers and implementing agencies with a planning tool that can better help ensure accountability and more effective results.<sup>28</sup>

In addition to defining activities, roles, and responsibilities of participating agencies, the Strategy also defines its scope and purpose and identifies the problems, risks, and threats associated with transnational gangs. In our prior work, we found that desirable characteristics of effective national strategies also include a discussion of purpose, scope, problems, risks, and threats. For example, in defining its purpose and scope, the Strategy notes that effectively addressing the problem of these transnational gangs requires close coordination and information sharing among the affected countries in Central America and Mexico and a comprehensive approach that includes law enforcement, prevention, intervention, rehabilitation, and reintegration for gang members, which the five categories of the Strategy are intended to address. In regards to identifying the problem, the Strategy states that gangs such as MS-13 and 18th Street threaten U.S. regional interests in fostering stable democracies and the U.S. domestic interest in protecting U.S. citizens from gang violence and crime. These characteristics help indicate why the Strategy was developed and identify the specific national issues and threats toward which the Strategy is directed.

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### The Strategy's Lack of an Oversight Framework Hinders Efforts to Enhance Accountability

Even as the Strategy contains several characteristics of effective national strategies, it lacks other characteristics, such as providing an approach for overseeing implementation of programs and efforts across its different categories. Our prior work on effective national strategies found that they include an approach or framework for overseeing their implementation or describe the organizations that will provide oversight, which enhances the accountability of agencies and stakeholders to implement programs as

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<sup>28</sup>In prior work, to develop these desirable characteristics of an effective national strategy, we reviewed several sources of information. First, we gathered statutory requirements pertaining to national strategies, as well as legislative and executive branch guidance. We also consulted the Government Performance and Results Act of 1993, general literature on strategic planning and performance, and guidance from the Office of Management and Budget on the President's Management Agenda. In addition, among other things, we studied past reports and testimonies for findings and recommendations pertaining to the desirable elements of a national strategy. Furthermore, we consulted widely within GAO to obtain updated information on strategic planning, integration across and between the government and its partners, implementation, and other related subjects. For more information on how these characteristics were developed, see [GAO-04-408T](#).

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planned.<sup>29</sup> This is especially important for the U.S. antigang strategy given that (1) there are eight federal departments or agencies involved in implementing the Strategy; (2) these agencies have wide-ranging missions and programs—from USAID’s mission to implement gang prevention and youth intervention programs to ICE’s mission to remove foreign-born gang members from the United States; and (3) the Strategy specifies 35 different activities under the five categories that federal agencies are to implement.

With regard to oversight, the Strategy itself does not identify an approach or framework for providing oversight across agencies’ implementation of the Strategy’s categories and activities and, according to DOJ, State, and USAID officials, one does not exist. Although the Strategy designates lead departments or agencies for each category, such as State leading the Diplomacy category and USAID leading the Prevention category, the Strategy does not designate an approach to provide oversight of the overall implementation of the Strategy across the Strategy’s various categories. Further, while members of an interagency antigang task force have discussed agencies’ efforts to implement the Strategy, this task force is not intended to provide this oversight. According to DOJ, State, and USAID officials, under the auspices of the NSC, the International Anti-Gang Task Force, which is chaired by DOJ’s Criminal Division and includes representatives from DOJ, DHS, State, and USAID, has responsibility for sharing information on the implementation of the Strategy. However, this task force is not intended to, nor does it, provide oversight for holding agencies accountable for implementation of their activities under the Strategy. Additionally, State’s regional gang advisor stated that no single department or entity has been identified as having oversight responsibility for the Strategy’s implementation. DOJ officials did not know why an oversight mechanism was not included in the Strategy, noting that, as a result, there is no enforcement mechanism to ensure that agencies are implementing their respective parts of the Strategy. USAID officials told us that after the Strategy was developed, the individual within the NSC who had been responsible for coordinating development of the Strategy stated that the council’s IOCPCC was to oversee the implementation of the Strategy; however this did not occur in part because the individual left the council. Additionally, although federal agencies are developing a strategy for the newly formed CARSI, participating agencies have not yet determined the oversight framework, if any, that is to be used for this broader initiative or whether the existing

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<sup>29</sup> [GAO-04-408T](#) and [GAO-06-788](#).

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antigang Strategy will be incorporated into CARSI. Thus, it is too early to tell whether CARSI will provide an oversight approach for federal agencies' antigang programs. Regardless of whether the antigang Strategy is incorporated into the new CARSI, or whether the NSC or some other agency or entity is responsible for oversight, establishing an approach or framework for oversight across the Strategy's categories could help enhance the accountability of agencies to implement activities as laid out in the Strategy and provide visibility over the extent to which agencies' individual efforts are achieving their intended results under the Strategy.

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### The Strategy's Lack of Performance Goals and Measures Hinders Efforts to Assess Progress

Our prior work found that effective national strategies set clear goals and related performance measures for assessing progress made in achieving intended results. The Strategy, however, does not identify the goals that are to be achieved through its implementation and the associated measures to track the progress made in achieving those goals, which could be established and monitored through an oversight approach or framework. We have reported that performance measurement is important because decision makers can use performance information to identify problems or weaknesses in programs, identify factors causing problems, and modify processes to address the problems.<sup>30</sup> USAID officials told us that after the Strategy was initially developed, the NSC intended to establish performance measures for implementation of the Strategy, but this did not occur in part because the individual within the NSC who had been responsible for coordinating development of the Strategy left the council. Although the Strategy itself lacks goals and measures to gauge results and assess progress across the Strategy's categories and activities, State and USAID, for their parts of the Strategy, have begun to develop mechanisms to assess the results of their efforts being implemented under the Mérida Initiative, including the initiative's antigang programs. For example, for its part, State has drafted four gang-specific performance measures within the broader set of measures it is developing for the Mérida Initiative: (1) number of arrests of suspected gang members completed by police units trained/equipped through Mérida Initiative funding in countergang strategies, (2) number of arrests and prosecutions of gang leaders in the region, (3) number of gang-related crime occurrences and homicides in the region, and (4) number of instances

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<sup>30</sup>GAO, *Aviation Security: A National Strategy and Other Actions Would Strengthen TSA's Efforts to Secure Commercial Airport Perimeters and Access Controls*, GAO-09-399 (Washington, D.C.: Sept. 30, 2009).

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where gang-related information is passed from the TAG to U.S. law enforcement for review/action. State officials noted that the department is working with its embassies to determine if Central American countries will be capable of providing the department with the requisite data needed to determine results and outcomes for these measures, as these countries control much of the data, often in disparate data sets and across various ministries. As of November 2009, State officials also reported that they were in the process of reviewing bids from contractors to develop performance measures for the department's Mérida Initiative programs, including its antigang programs, and to work directly with the host nations to obtain the necessary data to determine the results and outcomes of the efforts based on these measures.<sup>31</sup>

In addition to the measures State is developing to evaluate the results of Mérida Initiative-funded programs in Central America, USAID has developed a Mérida Initiative Central America Results Framework that includes an effect evaluation to be conducted by Vanderbilt University through a contractual arrangement with USAID. The agency intends for this evaluation to assess the long-term effect and measure the results of its programs in Central American communities that are the focus of USAID crime prevention efforts under the Mérida Initiative, including those related to gangs. The evaluation consists of five elements: (1) community surveys, (2) reviews of demographic data in the communities, (3) focus groups, (4) interviews with stakeholders such as community leaders, and (5) community observations such as physical infrastructure. Vanderbilt University officials are to conduct the evaluations every 18 months in communities where USAID-sponsored crime prevention activities have been implemented and communities where no activities have been implemented, with these latter communities serving as control groups in order to establish a baseline. Specifically with respect to the surveys, USAID plans to use the results to gauge the effect of its crime prevention programs through community and citizen perceptions on safety and security. To minimize any duplication and take advantage of survey efforts already underway, USAID officials stated that they plan to incorporate the survey questions on community and citizen perceptions on safety and

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<sup>31</sup>In addition to establishing performance measures for Mérida-funded programs in Central America, State plans to periodically discuss program results with countries in Central America. Specifically, under the terms of the agreements between the United States and the governments of each Central American country for implementing Mérida programs, representatives of each government will meet quarterly to evaluate the Mérida programs' progress toward achieving the performance measures described above.

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security as part of a broader survey Vanderbilt University will be conducting in the region in 2010.

Although State and USAID have begun to develop mechanisms to help assess the outcomes of antigang programs implemented under the Mérida Initiative, these mechanisms do not encompass all of the Strategy's categories and activities, nor do they include the antigang programs of other federal agencies, such as those of DOJ and DHS. For example, while the measures State is developing, such as the numbers of arrests of gang members and leaders in the region, relate to the law enforcement, capacity enhancement, and prevention categories of the Strategy, these measures do not encompass the diplomacy or repatriation categories of the Strategy. According to State and USAID officials as well as officials from the FBI and ICE, State and USAID have not consulted or worked with DOJ and DHS agencies such as FBI and ICE in developing these performance measures because State's and USAID's measures are intended to encompass only their own programs and efforts. According to State, USAID, DOJ, and DHS officials, each agency focuses on developing performance-related goals and measures for its own programs as opposed to other agencies' antigang programs for which it is not responsible, and, therefore, less familiar. As a result, the performance measures State and USAID are developing cannot serve as overall indicators of the federal government's progress in implementing the Strategy as they do not take into account all of the federal agencies' antigang programs to be implemented under the Strategy's five categories, including those programs led by DOJ and DHS. In the absence of goals and performance measures or other mechanisms for monitoring and assessing the progress and performance of agencies' antigang programs across the categories of the Strategy, it will be difficult for the federal government to determine if the overall interagency antigang effort is achieving the intended results and to hold agencies accountable for implementing the Strategy.

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## U.S. Federal Agencies Have Implemented Programs to Combat Transnational Gangs, but Could Take Additional Action to Enhance Coordination Efforts

Federal agencies have implemented a variety of programs to carry out the Strategy and combat transnational gangs with connections to Central America. To coordinate their implementation of antigang programs, agencies use a variety of mechanisms such as interagency committees and task forces. However, for the antigang unit in El Salvador, coordination among the FBI, ICE, and Salvadoran law enforcement in sharing investigative information on gangs could be enhanced by reaching agreement on ICE's participation in the unit. Further, although agencies have taken steps to develop performance measures and obtain data on those measures to track the results of programs, agencies are just starting to collect performance data due to the early stage of implementation of most of these programs. Additionally, federal agencies have identified various factors that are largely outside their control and that can affect their implementation of programs, such as challenges facing Central American countries in sustaining antigang programs.

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## Federal Agencies Have Developed a Variety of Programs to Implement the Interagency Strategy

To carry out the Strategy and combat transnational gangs with connections to Central American countries, federal agencies have developed and implemented a variety of programs in the United States and in host countries in the region, such as El Salvador and Guatemala. This variety of programs reflects the different categories of the strategy and includes diplomatic efforts to establish a coordinated approach to the gang problem; efforts to facilitate the repatriation of gang members who are in the United States illegally; mechanisms to facilitate the sharing of investigative information between U.S. law enforcement agencies and foreign law enforcement agencies; programs to provide training to Central American law enforcement officials; and programs to provide recreational and vocational opportunities for at-risk youth, among others. Additional details on federal agencies' antigang programs under each category of the Strategy are as follows:<sup>32</sup>

- **Diplomacy:** State has led efforts to engage diplomatically with Central American countries to discuss gang issues. The department has led discussions with member countries of the Central American Integration System. Under this initiative, the United States and Central American countries first held discussions regarding regional gang threats in July 2007, at which time the United States announced the Strategy. The

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<sup>32</sup>App. III provides a complete list of federal agencies' programs and efforts to combat transnational gangs with connections to Central America.

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countries held a second, and the most recent, dialogue in December 2008, which focused on discussing practical measures to combat the threats of criminal gangs, narcotics trafficking, and illicit trafficking of firearms in Central America. At the conclusion, all participating countries signed a communiqué pledging their continued support in the fight against transnational threats, including gangs.

- **Repatriation:** ICE has implemented the Electronic Travel Document system to facilitate the issuance of travel documents for the removal of illegal aliens, including gang members, to El Salvador, Guatemala, and Honduras. Under this program, ICE electronically sends travel document applications to the consular officials of these countries; these officials can then electronically sign and certify the documents stating that the countries will receive the illegal aliens to be removed.<sup>33</sup> These documents are available to ICE electronically through the Electronic Travel Document system. This program eliminates the need for consular officials to visit in person the individual awaiting removal from the United States before issuing documents, helping to reduce the amount of time it takes for ICE to receive travel documents from foreign countries and ultimately remove illegal aliens. According to ICE officials, the program can eliminate approximately 5 to 7 days that an alien would spend in detention, thus decreasing the cost incurred by the government.
- **Law Enforcement:** In 2005, ICE implemented Operation Community Shield—a nationwide initiative to arrest and remove criminal alien gang members from the United States. ICE began the operation to target violent transnational street gangs through the use of ICE’s broad law enforcement powers to identify, prosecute, and ultimately remove gang members from the United States. Although initially focused on MS-13, ICE expanded Operation Community Shield to target all transnational criminal street gangs, prison gangs, and outlaw motorcycle gangs. For its part, the FBI has implemented various programs to facilitate the exchange of information, such as criminal histories of suspected gang members, between law enforcement agencies in the United States and Central American countries. For example, in 2007, the FBI established a joint U.S.-Salvadoran Transnational Anti-Gang unit in El Salvador—called TAG—to exchange information on gangs and gang members between the Salvadoran national police and U.S.-based law enforcement agencies for

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<sup>33</sup>When an alien is ordered removed from the United States, a consular official from the alien’s country of origin must issue a travel document that allows the alien to return to his country. Once the alien’s citizenship or nationality has been verified, the consular official issues a travel document to effect the alien’s repatriation.

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use in criminal investigations and gang-member prosecutions in both countries. The unit includes investigators and analysts from the Salvadoran national police, prosecutors from El Salvador's Attorney General's Office, and two FBI agents. The TAG unit's exchange of information on gang members has aided U.S. gang investigations in locations such as Charlotte, North Carolina; Omaha, Nebraska; and Los Angeles, California. The FBI plans to establish units like this in Guatemala and Honduras. Further, in 2006, the FBI began the Central American Fingerprint Exploitation program to collect and store existing criminal fingerprint records and other biometric information from the countries of Mexico, El Salvador, Guatemala, Belize, and Honduras in FBI databases and make them available to all U.S. local, state, and federal law enforcement agencies. These records are searched in the FBI's Integrated Automated Fingerprint Identification System, with resulting matches shared with the contributing country for investigative purposes.<sup>34</sup> The FBI has deployed the system in El Salvador, conducted assessments to determine how to deploy the system to Belize and Panama, and plans to conduct more assessments for deploying the system to Guatemala and Honduras. In addition, beginning in 2008, the FBI, with funding from State, has implemented the Central American Law Enforcement Exchange program wherein law enforcement personnel from El Salvador, Guatemala, and Honduras have visited locations in the United States to receive antigang training and share investigative practices with U.S. law enforcement personnel. In exchange, law enforcement personnel from the United States have visited El Salvador to provide antigang training and share practices with Central American police.<sup>35</sup> Also related to law enforcement, ICE, in conjunction with State, established an international gang task force in Honduras in January 2010. Comprised of four Honduran police officers and one ICE agent, the task force is charged with

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<sup>34</sup>The Integrated Automated Fingerprint Identification System is a national fingerprint and criminal history system maintained by the FBI. Incorporating gang members' criminal biometric data / fingerprint records from the Central American Fingerprint Exploitation should make the data/records accessible by all U.S. local, state, and federal agencies by means of this system.

<sup>35</sup>The first round of exchanges occurred in May 2008 with four gang officers from El Salvador's national police traveling to Los Angeles where they spent 30 days with gang officers of the Los Angeles Police and Sheriff's Departments. The Los Angeles-based officers subsequently traveled to El Salvador for 30 days. The FBI then modified the program to a 3-week session that includes training at the FBI Academy and other learning opportunities in Washington, D.C.; Los Angeles; and El Salvador. In March 2009, 28 officers from 11 different law enforcement agencies across the United States, El Salvador, Honduras, and Guatemala participated. In October 2009, 27 officers from law enforcement agencies in the United States, El Salvador, Guatemala, Nicaragua, and Panama participated.

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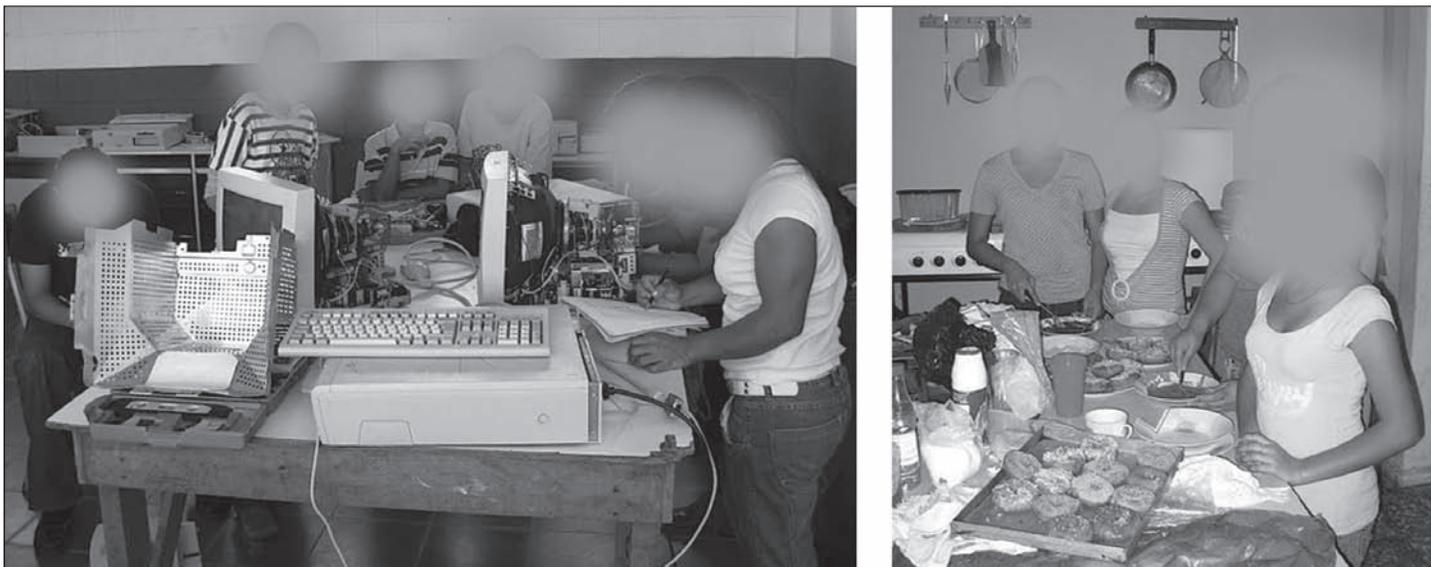
developing intelligence to initiate and support gang investigations in the United States and Honduras.

- **Capacity Enhancement:** To help enhance the capacity of Central American governments to address gangs, beginning in 2006, State, DOJ, DHS, and other agencies have provided antigang training courses to Central American law enforcement officials through the International Law Enforcement Academy in El Salvador.<sup>36</sup> The academy provides law enforcement training to officials from countries in Central and South America and the Caribbean. The training courses have focused on various aspects of gang enforcement efforts, such as police investigative techniques, prosecution, witness protection, and prison gang management, and participants have included police, prosecutors, judges, prison staff, border agents, and prevention and rehabilitation officials from El Salvador, Guatemala, Honduras, Mexico, Panama, and Belize. As another example of capacity enhancement, USAID has provided technical assistance and training to police, prosecutors, and judges, among others, to reform justice-sector institutions in El Salvador to help improve the investigation, prosecution, and prevention of crimes including those committed by gangs.
- **Prevention:** USAID has implemented gang prevention, intervention, and rehabilitation programs in Central American countries to provide youth with alternatives to joining gangs and assist former gang members' reentry into society. For example, through partnerships with faith-based and nongovernmental organizations and local governments in Central America, USAID has started youth centers in specific communities to provide a safe environment for recreational and vocational opportunities for young people. Figure 2 shows individuals participating in activities at these youth centers in El Salvador.

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<sup>36</sup>State's Bureau for International Narcotics and Law Enforcement Affairs funds the International Law Enforcement Academies. There are four academies, which are located in Europe (Budapest, Hungary), Southeast Asia (Bangkok, Thailand), Central America (San Salvador, El Salvador), and Southern Africa (Gaborone, Botswana); a regional training center in Lima, Peru; and a graduate-level academy (Roswell, New Mexico), in a cooperative effort with Treasury, DOJ, and DHS.

**Figure 2: Youth Participating in Activities at USAID-sponsored Youth Centers in El Salvador**



Source: GAO.

Youth participating in a computer repair class (left) and a baking class (right).

Note: The photographs have been altered to protect identities.

Additionally, USAID has sponsored a community-based policing program in Guatemala to improve the relationship between the police and local citizens by establishing collaborative partnerships between law enforcement and the communities they serve to solve problems and increase trust. According to USAID, the agency plans to expand the community policing program to five new communities in Guatemala as well as five communities each in El Salvador and Panama.

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Federal Agencies Have Coordinated Their Antigang Programs through Various Mechanisms, but Could Strengthen Coordination by Examining the Establishment and Composition of a Salvadoran-Based Law Enforcement Unit

Federal agencies have taken action to coordinate their antigang programs and share information with each other through various interagency and coordinating groups. For example, DOJ has established several entities to coordinate and share information on gang enforcement efforts, including transnational gangs, among DOJ and DHS component agencies. These entities include the Anti-Gang Coordination Committee that is comprised of representatives from a variety of DOJ components and agencies, as well as representatives from DHS's ICE, and meets at least quarterly each year to report on the status of antigang efforts and disseminate information for coordination. Another entity used to coordinate, share information and intelligence on gangs, and serve as a deconfliction center for gang operations is the National Gang Targeting, Enforcement, and Coordination Center (GangTECC).<sup>37</sup> GangTECC is comprised of participants from the FBI, ATF, DEA, and ICE, among other DOJ and DHS components, and has responsibility for coordinating multijurisdictional investigations of all gangs except FBI-led investigations involving the MS-13 and 18th Street gangs. In addition, the FBI's MS-13 National Gang Task Force has only FBI participants and is responsible for coordinating FBI's multijurisdictional investigations involving MS-13 and 18th Street gangs. Further, within Central American countries, federal agencies have mechanisms for coordinating and sharing information on antigang programs. For example, in El Salvador at the U.S. embassy, U.S. government agency officials who are involved in implementing antigang programs, such as officials from DOJ, DHS, State, USAID, and DOD, hold regular meetings to discuss antigang activities and coordinate their implementation efforts. Appendix IV provides additional information on the roles and responsibilities of these and other headquarters-level coordinating entities as well as task forces that coordinate antigang efforts at the field level within the United States.

In July 2009, we reported on the benefits and challenges associated with some of these various coordinating mechanisms. Specifically, we reported that entities such as the Anti-Gang Coordination Committee, GangTECC, and the MS-13 National Gang Task Force provide DOJ and DHS with a means to operate across agency boundaries and facilitate communication among participating agencies at the headquarters level.<sup>38</sup> However, we also

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<sup>37</sup>"Deconfliction" is the coordination and information sharing among law enforcement agencies on multijurisdictional investigations to help ensure officer safety and the effective use of resources.

<sup>38</sup>[GAO-09-708](#).

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reported that while some overlaps in mission may be appropriate, the entities had not clearly identified their roles and responsibilities, resulting in possible gaps or unnecessary overlaps in agencies' coordination and sharing of information on gang enforcement efforts, including those involving transnational gangs. Specifically, we reported that GangTECC and the MS-13 National Gang Task Force had overlapping missions and responsibilities for coordination and deconfliction of multijurisdictional investigations involving the MS-13 and 18th Street gangs. The two entities had these overlaps in part because the MS-13 National Gang Task Force already existed when GangTECC was established in 2006 and was not dismantled or folded into GangTECC at that time. We reported that both entities risked unnecessary federal resource expenditures to fund two entities when a single group could be more efficient. We recommended that DOJ, in consultation with DHS, articulate and differentiate roles, responsibilities, and missions of headquarters-level entities, which would strengthen headquarters-level coordination efforts to help ensure that they are not expended on overlapping missions. DOJ agreed with our recommendation and as of February 2010, DHS and DOJ officials reported that they are discussing ways to streamline processes, modify policies, and establish cross-cutting performance measures for federal gang programs.

At the field level, FBI and ICE could strengthen their coordination and sharing of information on gang members and investigations specifically in El Salvador by reaching agreement on ICE's participation in the TAG.<sup>39</sup> In El Salvador, both ICE and FBI contact the Salvadoran national police to request information and intelligence on gangs to assist in the agencies' gang investigations. The FBI makes its requests directly through its agents assigned to the TAG, while ICE's requests for Salvadoran national police information on gangs or gang members are sent through ICE's country attaché in El Salvador who forwards them to the FBI agents at the TAG. The FBI agents then pass the requests to Salvadoran national police officials if the FBI agents do not have the information needed to fulfill ICE's requests.<sup>40</sup> FBI and ICE officials stated that this process for

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<sup>39</sup> As of March 2010, El Salvador is the only Central American country to host a TAG. The FBI is in the process of establishing another TAG in Guatemala in 2010. Although one has also been planned for Honduras, it has been postponed indefinitely due to political unrest in the country.

<sup>40</sup> According to ICE's country attaché, sometimes when special ICE enforcement operations ongoing in the United States result in a temporarily high volume of ICE requests for information, ICE has sent an agent on a temporary-duty basis to El Salvador to help the attaché process ICE requests and work with the TAG to fulfill the requests.

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coordinating information requests for the Salvadoran national police through the TAG has worked well, but that the process could be further strengthened by ICE's participation in the TAG unit. Our work on effective interagency coordination has shown that collaborating agencies should organize joint and individual efforts and facilitate information sharing.<sup>41</sup> Collaborating agencies also look for opportunities to leverage each others' resources, thus obtaining additional benefits that would not be available if they were working separately. Coordinating in this way could yield benefits in terms of leveraging efforts already underway and minimizing any potential unnecessary duplication in federal agencies' requests for information on gang members or gang investigations. Various U.S. and Salvadoran officials have cited potential benefits that could be gained from ICE and FBI both participating in the TAG. The director of El Salvador's national police stated that he would like to see federal law enforcement agencies other than the FBI involved in the TAG unit, particularly ICE, because of ICE's role in managing the removal of gang members from the United States to El Salvador. The unit chief of FBI's MS-13 National Gang Task Force stated that the FBI would also benefit from ICE participating in the TAG to assist in deconflicting enforcement operations between the FBI and ICE in El Salvador. ICE's El Salvador country attaché stated that having an ICE agent at the TAG would streamline the current process since an ICE agent would be working directly at the TAG and be able to better identify possible connections between FBI and ICE gang cases and requests for information, thereby expediting information sharing.

The FBI and ICE have discussed signing a joint memorandum of understanding to provide parameters for ICE's participation in the TAG. According to the unit chief of the FBI's MS-13 National Gang Task Force, in 2008 the FBI presented ICE with a memorandum of understanding for ICE to participate in the TAG unit in which the FBI legal attaché would manage the TAG and coordinate TAG gang investigations with ICE. The FBI memorandum required ICE to coordinate all of its activities related to the TAG with the FBI legal attaché. However, according to the head of ICE's National Gang Unit, ICE would like to participate in the TAG more as an equal partner as opposed to being subordinate to the FBI. ICE officials stated that clarification is needed in regards to the administrative details on placing an ICE agent at the TAG such as housing and the location of the ICE agent's office, as well as agreement on the extent to

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<sup>41</sup> [GAO-06-15](#).

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which an ICE agent assigned to the TAG could focus on work for ICE-specific investigations as needed.

To help obtain this clarification and try to reach consensus on ICE participation in TAG, ICE officials stated that as of February 2010 they have not yet completed the process of drafting language to clarify their points of concern in the memorandum of understanding and plan to provide this draft language, once completed, to the FBI for its consideration. Further, the FBI and ICE have initiated discussions to conduct an assessment of ICE's possible participation in TAG by having an ICE agent who would conduct the assessment assigned to the unit on a temporary basis. However, as of February 2010, ICE and FBI have not yet reached agreement on this temporary assignment and ICE's plans to conduct the assessment because the two agencies disagree about the type and scope of the work that the agent would conduct for the assessment. The FBI and ICE could strengthen their coordination on gang investigations and enhance the efficiency of their existing process for exchanging information through the TAG by reaching consensus on ICE's participation in the unit. By reaching agreement on ICE's role, which the FBI and ICE have been considering since 2008, the two agencies would be in a better position to leverage their existing resources and information-sharing processes for gang investigations with a nexus to El Salvador.

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### Federal Agencies Have Established Performance Measures for Their Own Antigang Programs, but Some Programs Are in the Early Stages of Collecting Performance Data

Earlier in this report, we discussed federal government efforts to measure the results achieved with the overall Strategy. Separately, federal agencies have established performance measures, such as numbers of arrests of gang members, for assessing their own individual antigang efforts. However, as most of these programs are in the early stages of implementation, agencies' data on their programs' performance cannot yet be used to assess the level of activity or program results across time. For example, USAID officials said that because most of the Mérida Initiative funding for its Central American programs was not released to USAID field missions until July and August 2009, programs funded by the Mérida Initiative have yet to have any appreciable results to measure. In addition, several antigang programs in Central America have yet to be fully implemented. For example, ICE and the FBI are seeking to establish the Criminal History Information Program in El Salvador, Guatemala, and Honduras pending the hiring of needed analysts and completion of interagency agreements—expected to occur by the summer of 2010.

Although federal agencies' performance data do not yet indicate the level of progress or results achieved over time, federal agencies have begun to

report data on their levels of activity to date. For example, State has established measures for the antigang training courses offered through the International Law Enforcement Academy in El Salvador, including tracking data on the number of gang classes offered and the number of participants successfully completing them. According to State, the academy has offered 10 gang-related training courses since 2006 with a total of 416 participants from various countries including El Salvador, Honduras, Guatemala, and Mexico. In addition to these measures, State asks participants to complete course evaluations and uses these evaluations to make modifications to the antigang training courses, such as changes in curriculum.

USAID has also established measures for its own antigang programs, as shown in table 2. For example, USAID has established measures for its community policing program, such as the number of communities that have implemented community policing programs.

**Table 2: Examples of Measures USAID Tracks for Its Efforts to Combat Transnational Gangs from Central America**

Activity/program	Description of program	Date began	Examples of measures to be tracked
Community Action Fund	Provide employment-generating activities and education for youth at risk of gang involvement	2008	Number of people who have benefited from U.S. government-supported educational and socioeconomic opportunities
Community Policing Program	Promotes collaboration between communities and police in prevention activities to undermine gang effectiveness and recruitment, resulting in successful arrests of gang members and greatly improved cooperation and trust between the police and citizens of the communities	2008	Number of communities with joint police-citizen groups (e.g., community committees, police/school liaison, police/citizen activities, etc.)
Gang Prevention Program	Increases security through community and private-sector partnerships that work with at-risk youth to reduce gang recruitment, crime, and violence by building the capacity of communities and governments and by enhancing law enforcement efforts	2008	Number of communities assisted in crime prevention with U.S. government support

Source: GAO analysis of USAID data.

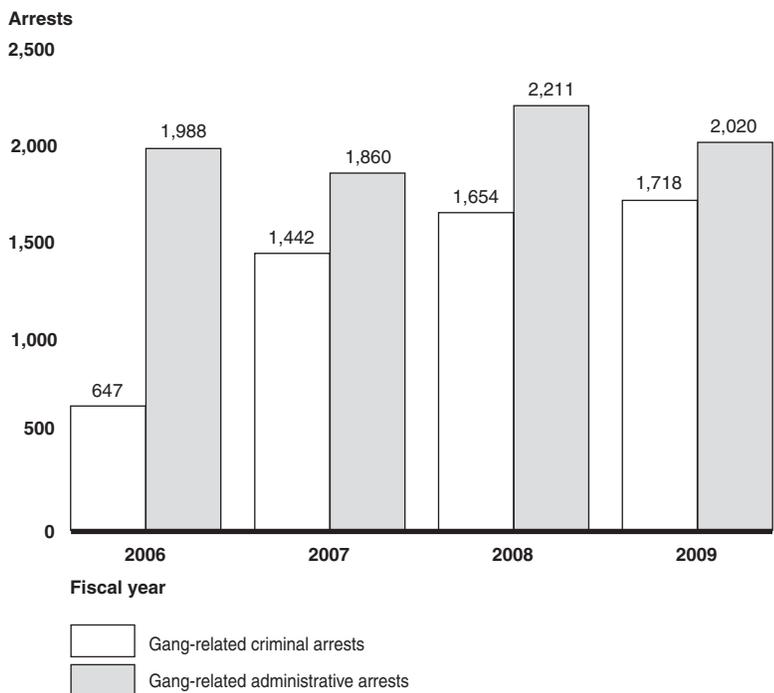
Note: Data sources include conversations with agency officials.

USAID also requires program contractors to develop performance indexes for their respective programs. For example, the private contractor conducting USAID’s Community-based Crime and Violence Prevention Project plans to review local government records to measure the crime rate in project-targeted communities. For other efforts related to youth

outreach centers, performance indicators tracked by program contractors include measures such as the number of youth who have received a job through the support of the outreach center or because of the skills acquired through the center.

With regard to its gang enforcement efforts, ICE reports on the number of gang-related criminal and administrative arrests, among other measures.<sup>42</sup> As shown in figure 3, the number of criminal and administrative gang-related arrests made by ICE has generally increased since fiscal year 2006, the first full year that it compiled this information.

**Figure 3: ICE Gang-Related Arrests (Fiscal Years 2006 through 2009)**



Source: ICE.

As shown in table 3, the FBI has also established various measures for each of its primary programs to combat transnational gangs. Among others, these measures include the number of gang cases worked and the

<sup>42</sup>Criminal arrests include aliens subject to removal who are charged with criminal violations, whereas administrative arrests refer to aliens who are unlawfully present in the United States but have not been charged with criminal violations.

number of countries and officials participating in the Central American Law Enforcement Exchange Program.

**Table 3: Performance Measures and Reported Results for the FBI's Efforts to Combat Transnational Gangs**

FBI program/activity	Performance measure	Outputs reported
MS-13 National Gang Task Force	<ul style="list-style-type: none"> <li>• Number of gang cases worked.</li> <li>• Number of coordination meetings with FBI Field Divisions and legal attaches.</li> <li>• Training provided to federal, state, local, and international law enforcement partners.</li> </ul>	<ul style="list-style-type: none"> <li>• According to the FBI, the task force conducted 19 investigations in fiscal year 2007, 29 investigations in fiscal year 2008, and 140 investigations in fiscal year 2009.</li> <li>• The task force reported conducting 10 case-coordination meetings in fiscal year 2007, 15 meetings in fiscal year 2008, and 23 meetings in fiscal year 2009.</li> <li>• The task force reported conducting 12 trainings for law enforcement partners in fiscal year 2007, 10 trainings in fiscal year 2008, and 15 trainings in fiscal year 2009.</li> </ul>
TAG unit	Number of requests for information received by the TAG to investigate leads on suspected gang members including whether a "hit" was made on the lead (i.e., a positive result).	During fiscal year 2008, the first year the FBI tracked performance metrics for the TAG, countries including El Salvador made 696 inquiries regarding transnational connections of suspected gang members. For fiscal year 2009, the FBI reported a total of 480 inquiries to the TAG.
	Number of contraband items recovered during TAG-assisted prison searches in El Salvador.	The FBI reported that 27 prison searches were conducted between September 2007 and November 2009. Over 1,000 items were seized during these prison searches.
	The number of arrests made by El Salvadoran law enforcement working in antigang operations who received coaching, advice, and instruction from the TAG unit.	According to the FBI, from the TAG's inception in September 2007 to July 2009, 16 gang members were arrested.
Central American Law Enforcement Exchange Program	Number of countries and officials participating in the program.	<p>FBI officials reported that in 2008, four officers from El Salvador and four officers from the United States (Los Angeles) participated in the first version of this program, which was referred to as the "Officer Exchange Program."</p> <p>According to the FBI's after-action report, "Exchange Class I" was conducted in March 2009 consisting of 27 participants representing four countries and nine law enforcement organizations. In addition to the United States, the countries included El Salvador, Honduras, and Guatemala. In October 2009, 27 officers from law enforcement agencies in the United States, El Salvador, Guatemala, Nicaragua, and Panama participated in a third exchange.</p>

FBI program/activity	Performance measure	Outputs reported
Central American Fingerprint Exploitation	Number of positive hits from foreign fingerprint data for subjects with U.S. criminal histories. The MS-13 National Gang Task Force maintains a record of all positive hits, warrants, and sexual offenders who are located.	According to FBI officials, approximately 3 million criminal fingerprint records from Central America and Mexico have been acquired. In particular, El Salvador, the only Central American country where the FBI has fully implemented the Central American Fingerprint Exploitation, has provided 75,000 fingerprint records in fiscal year 2009 to the FBI with 10,556 matches against U.S. criminal records for a match rate of approximately 15 percent.

Source: GAO analysis of FBI data.

In addition to these measures, the FBI has prepared after-action reports for the Central American Law Enforcement Exchange Program that summarize the results of the exchanges, including feedback from program participants, and has used these reports to modify the program. For example, according to the FBI, future exchange classes will include more practical and operational experiences (such as ride-alongs with local police officers and observation of police operations). Moreover, future classes will include more allowances for travel time and representation from more U.S. and foreign police departments.

For the TAG, the FBI did not start to collect data for the unit's measures, such as the number of requests for assistance the unit receives, until April 2008, about 6 months after the unit was established. According to FBI officials, no systematic log or other mechanism was used to track and record data on the TAG's activities from September 2007 through April 2008, because, at the start-up of the unit, agents were assigned on a temporary basis and were primarily focused on establishing and initiating the operations of the unit. Thus, the FBI lacks information about the unit's activity levels for its first 6 months of operation. Since FBI agents have been stationed at the TAG for 2-year, long-term rotations, these agents have developed and maintained a log to track the unit's activities and assistance provided to FBI offices and other law enforcement agencies. This data maintained by the TAG is used by FBI, particularly the MS-13 National Gang Task Force, to identify trends in where transnational gang members are located and traveling to and proactively target specific geographic areas for gang education or enforcement activities.

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## Various Factors Affect U.S. Efforts to Implement Antigang Programs in Central American Countries

Even as agencies have worked to implement antigang programs in Central America, various factors in the region largely outside of the control of U.S. agencies pose challenges to the implementation of the programs. These factors include: the ability of host countries to sustain programs after U.S. support ends; Central American law enforcement personnel issues; and legal restrictions in Central American countries, such as El Salvador, that diminish the benefits of efforts.

- **Sustainability of programs by host countries:** Federal agencies have identified challenges facing Central American countries in sustaining antigang programs currently being initiated and implemented in the region. Specifically, State officials identified several factors outside the control of U.S. agencies that contribute to the uncertainty as to whether Central American countries will be able to sustain antigang programs over the long term. These officials reported that the ability of partner countries to take responsibility for managing and supporting U.S.-funded antigang programs is hampered by the fact that these countries often do not have the financial resources to sustain the programs in the absence of U.S. funds. State officials said that the ability of foreign countries to sustain antigang programs is hindered by other factors as well, such as corruption throughout the countries' police and judiciary structures; a lack of investment in police training to make the countries' police forces more professional and accountable; the countries' inability to provide police forces with equipment such as communications gear and transportation assets; and the ability of the gangs to quickly adapt to law enforcement strategies.

To help address these issues, federal agencies have taken steps prior to implementing these programs to plan for how the programs will be sustained, particularly after U.S. federal funding ends. For example, State officials said that when the department first developed and implemented these programs, it took into account the ability of foreign countries to take over and manage antigang programs initially funded and managed by the United States. Specifically, the officials noted that they worked directly with host country officials to gain an understanding of what programs or efforts the countries needed and what the countries might be able to support, both in terms of resources available and a supportive political climate, and then used that as a starting point to identify and shape the efforts that would receive U.S. support. According to USAID officials, USAID also took similar steps to work with host country officials to identify antigang efforts the countries had planned or were already underway for which USAID could provide additional support. Officials stated that they chose this approach because they sought to support local initiatives and programs whenever possible, as programs already planned

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or implemented by the host countries are more likely to be sustained by the countries themselves. Rather than setting up similar programs that would compete for resources, providing support for the host countries' programs helped to broaden the reach of the programs into additional areas that the host countries may not have had resources for otherwise. Further, USAID officials reported that they coordinated with the host countries and other donors to ensure that the host countries would assume responsibility for the activities when USAID funding expires. In regard to FBI-led efforts such as the TAG, FBI officials stated that they also considered the ability of the foreign government to support these efforts during negotiations between the foreign governments, such as El Salvador, and the FBI to establish the units.

To help prepare for sustaining antigang programs over the long term, federal agencies have also taken action after these programs have been implemented. For example, at the country level, USAID officials work directly with host government partners and with other donors through regular donor coordination groups and meetings to identify best practices for sustaining efforts and incorporating those practices into programs. Further, FBI officials have discussed with the Salvadoran government ways for the government to provide the resources and commitment needed to help sustain the TAG unit over the long term. According to the unit chief of the MS-13 National Gang Task Force who manages the TAG, other than what the FBI pays for in the salaries and living expenses of the FBI agents based at the TAG, the Salvadoran government provides the other resources necessary to sustain the TAG's operations.

- Screening process for law enforcement personnel and transfer of personnel: Finding a sufficient number of Central American law enforcement personnel who can pass the screening process required to participate in U.S. investigative and information-sharing programs can complicate the implementation of those programs. For example, in order to become part of the FBI's TAG unit, police officers must receive a background screening before initially joining the unit and undergo a polygraph every 6 months thereafter. Under the rules of the TAG, if officers fail the polygraph, they must leave the unit. FBI officials stated that, as was the case in El Salvador when they set up the TAG in that country, they expect to face challenges in identifying and successfully screening a sufficient number of Guatemalan and Honduran police officers

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to participate in the units planned for those countries.<sup>43</sup> To address this challenge, the FBI is planning to establish smaller TAG units in Guatemala and Honduras (10 officers each instead of the 20 stationed at the Salvadoran TAG) and set aside more time and resources for screening Guatemalan and Honduran police officers for the units. FBI officials also stated that one disadvantage of the first officer exchange with El Salvador was that of the four participating Salvadoran police officers, only two officers continued to work on gang investigations in El Salvador after the exchange was completed with the other two being transferred to different areas within the Salvadoran police force. Although the FBI has an agreement with participating countries that requires exchange participants to be involved in gang investigations for at least 2 years after the exchange has concluded so they can put into practice the training they received and share it with their colleagues, FBI officials noted that there is little they can do to ensure participating countries abide by this requirement.

- Legal restrictions: According to officials we interviewed from the FBI and DOJ's Criminal Division, Central American countries' laws can also pose challenges for conducting gang investigations in the region, or for federal agencies that may seek the extradition of individuals to face trial for crimes committed in the United States. According to an FBI official with the MS-13 National Gang Task Force, legal restrictions in countries such as El Salvador do not permit law enforcement to conduct electronic surveillance or wiretaps as part of their investigations. According to this official, while this restriction has not hindered the ability of the Salvadoran national police to conduct investigations, it takes more time and effort to develop and corroborate the evidence through the use of other investigative methods. According to an official from DOJ's Criminal Division, a recent amendment to the Salvadoran constitution now allows the use of electronic surveillance as a tool in criminal investigations and the Salvadoran National Assembly is currently considering implementing legislation. In regard to the extradition of gang members wanted in the United States, FBI officials noted that countries such as El Salvador have laws that prohibit the extradition of individuals to other countries where they could face a more severe punishment than would be given in El Salvador for the same crime. As an example, the unit chief of the MS-13 National Gang Task Force stated that the FBI had requested the extradition of a gang leader imprisoned in El Salvador for prosecution in Baltimore, Maryland, where the individual would have likely faced a longer prison sentence for the crime. However, the FBI's request for

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<sup>43</sup>As of August 2009, FBI officials stated that establishment of a transnational antigang unit in Honduras has been placed on hold because of the political instability in the country.

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extradition was denied, preventing the gang leader from facing the charges against him in the United States. Nevertheless, DOJ's Criminal Division reported that on December 22, 2009, the Supreme Court of El Salvador voted to permit the first extradition of a Salvadoran national pursuant to the extradition treaty between the United States and El Salvador.<sup>44</sup>

Officials explained that future extraditions may still be limited by the penalties applicable to extradited individuals, such as the death penalty and life imprisonment. To help address these challenges, DOJ's Criminal Division continues to work with El Salvador under the existing treaty to facilitate extradition between the United States and El Salvador.

Despite these challenges, officials from the agencies we interviewed stated that they continue to work to address or mitigate the effect of these challenges and to ensure their antigang programs are both sustainable and effective.

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## Conclusions

Given the rapid growth of transnational gangs, their propensity for violence, and the public safety threats they pose, the response to these gangs requires a comprehensive and collaborative approach on the part of federal agencies that have different responsibilities and missions for combating transnational gangs. The Strategy to Combat the Threat of Criminal Gangs from Central America and Mexico (the Strategy) provides a roadmap for federal departments and agencies to follow in designing and implementing efforts to combat the gangs. However, while individual federal agencies may be familiar with the implementation of their own antigang programs, or those in the Strategy for which they are responsible, they do not necessarily have the visibility across the Strategy's categories to determine the extent to which the broader strategy is being implemented. Regardless as to whether it remains a separate effort or is incorporated into the broader CARSI being developed, incorporating an approach for overseeing the interagency effort to combat transnational gangs would help provide visibility by designating an agency or entity to ensure that the Strategy is being implemented as planned. In addition, as the Strategy and related antigang efforts are implemented, it will be important to be able to track the effect the Strategy as a whole is having against the transnational gang problem. By establishing performance goals and measures or other mechanisms to evaluate the progress made in implementing the Strategy, federal agencies, Congress, and other

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<sup>44</sup>See Treaty of Extradition Between the United States of America and El Salvador, April 18, 1911, 37 Stat. 1516.

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stakeholders could have more specific information relating to agencies' performance under the Strategy, thereby enabling them to make more informed decisions as to what adjustments to the Strategy might be necessary, if any, to achieve its desired effect. Relatedly, while federal agencies have taken various actions to collaborate on their transnational antigang efforts, agencies such as the FBI and ICE can take steps to further resolve their roles and participation in the TAG unit in El Salvador, especially given that the FBI and ICE have been discussing this participation since 2008. By reaching agreement on ICE's participation in the unit, both agencies could realize additional information-sharing benefits not only with each other, but with foreign counterparts, and help ensure that resources to combat gangs in El Salvador are used efficiently and effectively.

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## Recommendations for Executive Action

To strengthen oversight and accountability for implementation of the Strategy to Combat the Threat of Criminal Gangs from Central America and Mexico (the Strategy), we recommend that the Special Assistant to the President for National Security Affairs, in conjunction with DOJ, DHS, State, USAID, and DOD, revise the Strategy to include, or include in the CARSII if the Strategy is incorporated into that initiative

- an approach or framework for overseeing implementation of the Strategy and antigang efforts in Central America, and
- performance goals and measures to assess progress made in achieving intended results under the Strategy.

To strengthen federal agencies' coordination of antigang efforts and maximize use of federal law enforcement resources in El Salvador, we recommend that the Attorney General and the Secretary of Homeland Security reach agreement on ICE's role and participation in the TAG unit.

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## Agency Comments and Our Evaluation

We provided a draft of this report for review to the Departments of Defense (DOD), Homeland Security (DHS), Justice (DOJ), and State (State); the U.S. Agency for International Development (USAID); and the National Security Council (NSC). DHS, DOJ, and USAID provided written comments on the draft report. DOD, State, and the NSC did not provide comments.

In their written comments, DHS and DOJ concurred with our recommendation that the Attorney General and the Secretary of Homeland Security reach agreement on ICE's role and participation in the TAG unit

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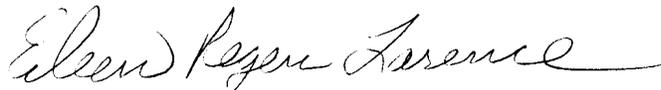
in El Salvador, and outlined steps they have begun to take to address this recommendation. For example, DHS commented that ICE officials have reviewed the FBI's memorandum on the TAG to clarify the roles and responsibilities of ICE and the FBI within the unit in El Salvador. DOJ also commented that any agreement on DHS's participation in the TAG unit in El Salvador should also address DHS's participation in future TAG units that the FBI expects to create in Guatemala and Honduras.

In its written comments, USAID commented that it acknowledges the importance of increased interagency coordination to help bolster U.S. government efforts to address the threat of criminal gangs in Central America and the United States.

DHS's, DOJ's, and USAID's written comments are contained in appendixes VI, VII, and VIII, respectively. We also incorporated technical comments provided by DHS, DOJ, and USAID as appropriate.

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We are sending copies of this report to the Special Assistant to the President for National Security Affairs; the Attorney General; the Secretaries of Homeland Security, State, and Defense; the Administrator of USAID; selected congressional committees; and other interested parties. In addition, the report will be available at no charge on the GAO Web site at <http://www.gao.gov>. Please contact Eileen Larence at (202) 512-8777 if you or your staff have any questions concerning this report. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix IX.



Eileen R. Larence  
Director, Homeland Security and Justice Issues

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# Appendix I: Leadership Structure and Key Transnational Criminal Activities of MS-13 and 18th Street

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Federal agencies have specifically identified two primary gangs with connections to Central America—Mara Salvatrucha (MS-13) and 18th Street—as posing the most significant public safety threats to the United States and Central American countries among transnational gangs. This appendix summarizes information federal agencies have on the leadership structure and transnational criminal activities of these two gangs.

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## Leadership of the Gangs

Federal agencies have reported that these gangs generally do not have a centralized leadership structure. Rather, most gang cliques—or local gang groups—tend to operate in specific areas or communities in the United States and Central America and have autonomy to function independently without reporting to a central authority or leadership. However, law enforcement officials have reported that in some gang cliques activities are directed by gang leaders incarcerated in Salvadoran prisons. These leaders communicate by cell phones or coded written messages that are smuggled in and out of the prisons. Of the five U.S. locations<sup>1</sup> we visited to discuss gang investigations with federal, state, and local law enforcement, three reported instances in which gang leaders incarcerated in El Salvador directed gang members to organize new cliques, coordinate with cliques in other parts of the country, and carry out criminal activities, including murder. For example, an investigation in Charlotte, North Carolina, found that MS-13 clique leaders were sent to establish cliques at the behest of leaders in El Salvador. Further, according to the FBI, cliques convene periodically with gang leadership to determine future criminal activities and punishments for individual delinquent gang members.

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## Transnational Criminal Activities of the Gangs

Transnational gangs engage in criminal activities that not only affect local communities in the United States and Central American countries, but that also stretch beyond U.S. and Central American borders. For example, in its 2006 Central America and Mexico Gang Assessment, U.S. Agency for International Development (USAID) reported that gang activity has transcended the borders of Central America, Mexico, and the United States and evolved into a transnational concern.<sup>2</sup> USAID reported that

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<sup>1</sup>We interviewed a mix of federal, state, and local law enforcement officials regarding MS-13 or 18th Street investigations in Los Angeles, California; Omaha, Nebraska; Nashville, Tennessee; Baltimore, Maryland; and Charlotte, North Carolina.

<sup>2</sup>USAID, *Central America and Mexico Gang Assessment* (Washington, D.C.: April 2006). This is the most recent regionwide assessment of gangs conducted by USAID.

while gang activity used to be territorially confined to local neighborhoods, globalization, sophisticated communications technologies, and travel patterns have facilitated the expansion of gang activity across neighborhoods, cities, and countries. Further, the 2009 National Gang Threat Assessment indicated that U.S. street gangs are expanding their influence in most regions and broadening their presence outside the United States to develop associations with criminal organizations in Mexico and Central America. According to federal agencies, major cross-border criminal activities in which transnational gangs engage include drug trafficking and distribution, human smuggling, and extortion, among others.

With regard to drug trafficking and distribution, assessments conducted by the National Gang Intelligence Center, the National Drug Intelligence Center, the U.S. Agency for International Development, and the Federal Bureau of Investigation (FBI) indicate that connections exist between drug trafficking organizations and MS-13 and 18th Street gangs and these connections may be expanding. Several agencies also suggested that both gangs' connections with prison gangs such as the Mexican Mafia<sup>3</sup> may provide a link to drug trafficking organizations, as one of the prison gangs' main sources of income is extorting money from drug distributors outside prison and distributing various narcotics within and outside the prison system. Further, the U.S. Southern Command (SOUTHCOM) has reported that drug trafficking organizations have worked with MS-13 and 18th Street gangs to distribute their narcotics in Central America and the United States.<sup>4</sup> MS-13 and 18th Street gangs have also been identified as engaging in retail street distribution of narcotics in the United States, for example. Although connections between gangs and drug trafficking organizations exist and may be growing, these connections may not yet

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<sup>3</sup>The Mexican Mafia prison gang operates mainly within the California Department of Corrections. It is loosely structured and has strict rules that must be followed by the estimated 350 to 400 members. Most members are Mexican American males who previously belonged to a Southern California street gang. The gang's main source of income is extorting drug distributors outside prison and distributing various narcotics within and outside the prison system. Some members of these prison gangs have direct links to Mexican drug trafficking organizations and broker deals for themselves and their associates. MS-13 and 18th Street are linked to numerous prison gangs, such as the Mexican Mafia, and these relationships are advantageous. Members must pay taxes to prison gangs in exchange for protection in prison. If members refuse, they risk being killed by the prison gangs.

<sup>4</sup>SOUTHCOM, Intelligence Assessment: Criminal Gang and Drug Trafficking: A Relationship of Convenience (March 13, 2008).

reflect large-scale, organized cooperation between gangs and drug-trafficking organizations. For example, Drug Enforcement Administration (DEA) officials stated that while individual gangs and gang members might work with drug trafficking organizations for their own personal gain, DEA has not observed or obtained evidence of high-level, organized cooperation between gangs and drug trafficking organizations. Likewise, the United Nations Office on Drugs and Crime has reported that because the Central American drug market is too small for gangs to develop into major distributors, the gangs lack the maritime capabilities required for the transport of drugs from Central America, and gangs have limited involvement in the U.S. narcotics market, the link between Central American gangs and drug trafficking organizations may not yet be well-developed.

In addition to their involvement in drug trafficking and distribution, transnational gangs have also been involved in other cross-border crime, including alien smuggling and extortion. For example, the 2009 National Gang Threat Assessment indicated that U.S.-based gang members are increasingly involved in cross-border criminal activity that includes smuggling illegal aliens from Mexico into the United States. Moreover, U.S. Customs and Border Protection and the FBI reported that MS-13 is known to smuggle persons from Central America into the United States from Mexico. The FBI has also reported that 18th Street may be involved in human trafficking and alien smuggling. However, the FBI stated that it is difficult to determine gang members' roles—whether they are organizing the border crossings, smuggling other aliens into the country, or being smuggled themselves.

In addition, federal agencies have reported that extortion and retail drug distribution provide financial support for both MS-13 and 18th Street. Cliques have been reported to extort those who conduct illicit activities themselves, such as prostitution or drug distribution entities, within the gangs' territory. In the United States, transnational gang members are known also to extort money from businesses that operate within gang territory in exchange for not inflicting harm on the businesses or those businesses' owners, family members, or workers. Both MS-13 and 18th Street gangs also conduct extortion across international borders. For example, gang members in the United States may extort immigrants with threats that they will retaliate against family members in Central America if law enforcement is notified. In some instances, the gangs have coupled extortion with kidnapping. The FBI has reported that MS-13 has kidnapped illegal immigrants and then extorted money from their families for the immigrants' safe return.

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**Appendix I: Leadership Structure and Key  
Transnational Criminal Activities of MS-13  
and 18th Street**

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Finally, with regard to links to terrorists, federal agencies have found no indication that U.S. gangs with transnational ties have routine relationships.

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# Appendix II: Characteristics of Other Transnational Gangs

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According to the National Gang Intelligence Center (NGIC), three basic types of gangs have been identified by gang investigators: street gangs, prison gangs, and outlaw motorcycle gangs. The focus of this report has been on gangs with ties to Central America, such as Mara Salvatrucha (MS-13) and 18th Street, which belong to the “street gang” category. However, all three categories contain gangs with members who are either present or criminally active (or both) in more than one country. This appendix provides examples of other gangs in these categories, including descriptions of their transnational activities. Most of the information presented in this appendix is from the April 2008 Attorney General’s Report to Congress on the Growth of Violent Street Gangs in Suburban Areas and supplemented by information obtained from interviews with agency officials.

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## Street Gangs

According to federal law enforcement, street gangs are typically associated with a particular neighborhood, town, or city, which they may incorporate into the name of their gang. However, law enforcement officials report that several street gangs have attained regional or national status and operate in a number of states throughout the country. Two examples of these street gangs that also have transnational connections include the following:

- **Florencia 13:** Florencia 13 originated in Los Angeles in the early 1960s. Gang membership is estimated to be more than 3,000. This gang operates primarily in California, but is expanding to other states. Drug trafficking is a primary source of income for the gang whose members smuggle cocaine and methamphetamine from Mexico into the United States for distribution. Florencia members are also involved in other criminal activities including assault, drive-by shooting, and homicide.
- **Latin Kings:** Latin Kings is a collection of over 160 structured gangs, referred to as chapters, operating in 158 cities in 34 states in the United States. The gang’s membership is estimated to be 20,000 to 35,000. Most members are Mexican-American or Puerto Rican males whose main source of income is street-level drug sales. The gang obtains drugs primarily from Mexican drug trafficking organizations that operate along the U.S.-Mexico border. Members also engage in other criminal activity such as assault, burglary, homicide, identity theft, and money laundering.

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## Prison Gangs

According to federal law enforcement officials, prison gangs are criminal organizations that operate within federal and state prison systems as self-perpetuating criminal entities. These gangs also operate outside of prisons

typically through the activities of members who have been released from prison into communities. Examples of prison gangs with transnational connections include the following:

- **Barrio Azteca:** Barrio Azteca is one of the most violent prison gangs in the United States. The gang is highly structured and has an estimated membership of 2,000. Most members are either Mexican national or Mexican American males. Barrio Azteca is most active in the southwestern United States, primarily in federal, state, and local corrections facilities in Texas and outside of prison in southwestern Texas and southeastern New Mexico. The gang's main source of income is derived from smuggling illegal drugs from Mexico into the United States for distribution both inside and outside prisons. Gang members often transport illicit drugs across the border for drug trafficking organizations. Gang members are also involved in other crimes including alien smuggling, arson, assault, extortion, kidnapping, and weapons violations.
- **Hermanos de Pistoleros Latinos:** This is a Hispanic prison gang formed in Texas in the late 1980s. It operates in most prisons in the state and on the streets in many communities in Texas, particularly Laredo. The gang is also active in several cities in Mexico, and its largest contingent in that country is located in Nuevo Laredo. The gang is structured and is estimated to have 1,000 members. These members maintain close ties to several Mexican drug trafficking organizations and are involved in the trafficking of large quantities of illegal drugs from Mexico into the United States for distribution.
- **Mexican Mafia:** This gang was formed in the late 1950s within the California prison system. It is loosely structured and has strict rules that must be followed by the estimated 350 to 400 members. Most of these members are Mexican American males who previously belonged to a Southern California street gang. Mexican Mafia is active in 13 states, but California remains the power base. The gang's main source of income is extorting drug distributors outside prison and distributing illegal drugs within the prison system and on the streets. Some members have direct links to Mexican drug trafficking organizations. Other criminal activities include controlling gambling and homosexual prostitution in prison.
- **Mexikanemi:** The Mexikanemi prison gang was formed in the early 1980s within the Texas prison system. The gang is highly structured and estimated to have 2,000 members, most of whom are Mexican national or Mexican American males who were living in Texas at the time of their incarceration. This gang poses a significant drug trafficking threat to communities in the southwest region of the United States, particularly

Texas. Gang members reportedly traffic illegal drugs from Mexico into the United States for distribution inside and outside of prison. Gang members obtain these drugs from Mexican drug trafficking organizations.

- Surenos: As some individual Hispanic street gang members enter the prison systems, they put aside rivalries with other Hispanic gangs and unite under the name Surenos. The original Mexican Mafia members, most of whom were from Southern California, considered Mexicans from the rural, agricultural areas of Northern California as weak and viewed them with contempt. To distinguish themselves from these northern agricultural workers, members of Mexican Mafia began to refer to the Hispanic gang members that worked for them as Surenos (Southerners). Surenos gang members' main source of income is retail-level distribution of illegal drugs both within prison systems and in the community, as well as the extortion of drug distributors on the streets. Some members have direct links to Mexican drug trafficking organizations and broker deals for Mexican Mafia as well as their own gang. Other criminal activities of Surenos members include assault, car jacking, home invasion, homicide, and robbery.
- Texas Syndicate: Texas Syndicate is one of the largest and most violent prison gangs. It is active on both sides of the U.S.-Mexico border and poses a significant drug trafficking threat to communities in the southwest region. The gang is highly structured and is estimated to have 1,300 members, most of whom are Mexican American males between 20 and 40 years of age. Gang members smuggle illegal drugs from Mexico into the United States for distribution inside and outside of prison. Gang members have direct working relationships with drug trafficking organizations.

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## Outlaw Motorcycle Gangs

According to federal law enforcement, outlaw motorcycle gangs (OMG) have been in the United States longer than many other gangs and are most numerous in the United States. According to the Department of Justice (DOJ) Gang Unit, there are more than 300 active OMGs in the United States, ranging in size from single chapters with five or six members to hundreds of chapters with thousands of members worldwide. DOJ considers OMGs to be transnational criminal organizations because they typically maintain chapters in more than one country and engage in illicit cross-border activities. OMG chapters are found on every continent.

OMGs are highly organized with well-defined hierarchies, defined rules in the form of either bylaws or constitutions, and clear recruitment, acceptance, and promotion processes for members. OMGs have a distinct chain of command, much like a corporation with positions such as president, vice-president, treasurer, sergeant-at-arms, and road captain at

the chapter level. Generally, OMG organizational structure consists of individual chapters grouped by geographic region all being headed by a national president. While national and international presidents may exist, each regional chapter is run by its own president. The gang leadership requires loyalty and obedience from members. OMG members may be governed by a code of ethics, a constitution, or a strict set of bylaws. Descriptions of major OMGs present in the U.S. follows—including details on the gangs’ transnational connections.

- **Hells Angels Motorcycle Club:** According to U.S. law enforcement officials, the Hells Angels are the largest and the most criminally prominent of the “Big Five” OMGs.<sup>1</sup> The gang includes 2,000 to 2,500 members belonging to over 230 chapters in the United States and 26 foreign countries. In the United States, law enforcement officials estimate that Hells Angels has more than 92 chapters in 27 states with over 800 members. Gang members produce, transport, and distribute marijuana and methamphetamine and transport and distribute cocaine, hashish, heroin, and other drugs. Other crimes perpetrated by Hells Angels members include assault, extortion, homicide, money laundering, and motorcycle theft.
- **Bandidos:** U.S. law enforcement authorities consider the Bandidos and Hells Angels to be the two largest OMGs in the United States. This gang has approximately 900 members belonging to over 93 chapters in the United States, with a total of 2,000 to 2,500 members when the membership in 13 other countries is added to U.S. membership. Bandidos is involved in transporting and distributing cocaine and marijuana and producing, transporting, and distributing methamphetamine. The gang is most active in the Pacific, southeast, southwest, and west central regions of the United States and is expanding in these regions by forming new chapters and allowing members of support clubs<sup>2</sup> to form or join Bandidos chapters.
- **Mongols Motorcycle Club:** According to law enforcement officials, the Mongols Motorcycle Club is an extremely violent OMG that poses a serious criminal threat to the Pacific and southwest regions of the United States. Mongols members transport and distribute cocaine, marijuana, and

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<sup>1</sup>The remaining four OMGs that make up the “Big Five” include the Bandidos Motorcycle Club (Bandidos), the Mongols Motorcycle Club (Mongols), the Outlaws Motorcycle Club (Outlaws), and the Pagans Motorcycle Club (Pagans).

<sup>2</sup>“Support clubs” are members of subordinate clubs that swear allegiance to a mother club and whose purpose is to do the “dirty work” of the mother club.

methamphetamine and frequently commit violent crimes including assault, intimidation, and murder to defend Mongols territory and uphold its reputation. Most of the club's 300 members are Hispanic males who live in the Los Angeles area, and many are former street gang members with a long history of using violence to settle grievances. The club also maintains ties to Hispanic street gangs in Los Angeles. In the 1980s, the Mongols OMG seized control of southern California's OMG activity from the Hells Angels and today is allied with the Bandidos, Outlaws, and Pagan's OMGs against the Hells Angels.

- **Outlaws:** Outlaws has more than 1,700 members belonging to 176 chapters in the United States and 12 foreign countries. U.S. law enforcement officials estimate that Outlaws has more than 86 chapters in 21 states with over 700 members in the United States. Outlaws are the dominant OMG in the Great Lakes Region of the United States. Gang members produce, transport, and distribute methamphetamine and transport and distribute cocaine and marijuana. Other criminal activities engaged in by Outlaws include arson, assault, explosives operations, extortion, fraud, homicide, intimidation, kidnapping, money laundering, prostitution, robbery, theft, and weapons violations. Outlaws compete with the Hells Angels for membership and territory.
- **Vagos Motorcycle Club:** The Vagos OMG has hundreds of members in the United States and Mexico and poses a serious criminal threat to those areas in which chapters are located. Law enforcement reports that Vagos has approximately 300 members among 24 chapters in California, Hawaii, Nevada, Oregon, and three chapters in Mexico. Club members produce, transport, and distribute methamphetamine and distribute marijuana. Vagos members also have been implicated in other criminal activities including assault, extortion, insurance fraud, money laundering, murder, vehicle theft, weapons violations, and witness intimidation.
- **Black Pistons:** This OMG is the official support club of the Outlaws Motorcycle Club. Established in 2002 with the backing of the Outlaws, Black Pistons has expanded rapidly throughout the United States and into Canada and Europe. The club has an estimated 70 domestic chapters in 20 states and an unknown number of foreign chapters in Belgium, Canada, Germany, Great Britain, Norway, and Poland. The exact number is unknown but is estimated to be more than 200 in the United States. The Outlaws OMG uses Black Pistons chapters as sources of prospective new members. The Outlaws also uses Black Pistons chapters to conduct criminal activity, especially transporting and distributing drugs. Black Piston members also engage in assault, extortion, fraud, intimidation, and theft.

# Appendix III: Federal Agencies' Programs to Address Transnational Gangs with Connections to Central America

Federal agencies have developed and implemented a wide range of programs to combat transnational gangs in the United States that have links to Central America. As shown in table 4, some of these efforts directly combat the gangs while others seek to improve criminal justice systems to increase the ability of Central American countries to apprehend and prosecute criminals including gang members (such as Community Policing and Justice Sector Reform). As also shown in table 4, other efforts are aimed at improving educational and employment opportunities of youth to reduce the motivation for joining gangs (such as Youth Centers).

**Table 4: Examples of Federal Efforts or Projects Implemented to Combat Central American Transnational Gangs, by Agency and Country Where Implemented**

Lead implementing agency	Country	Effort or project	Description of effort/project
Federal Bureau of Investigation (FBI)	El Salvador	Transnational Anti-Gang Unit (TAG)	Through the TAG, information on MS-13 and 18th Street gang members is shared between U.S. law enforcement agencies and El Salvador's Civilian National Police for use in criminal investigations and gang-member prosecutions. The TAG includes investigators from the Salvadoran police, Salvadoran prosecutors, and FBI agents. TAG funding is provided by the State Department.
	Multiple countries in Central America	Central American Fingerprint Exploitation	This program collects biometric and fingerprint records maintained by Central American law enforcement agencies and makes them accessible to U.S. law enforcement agencies. The program helps countries acquire automated fingerprint technology along with technical and other support. The system has been deployed in El Salvador, and assessments have been conducted in Belize and Panama and are planned for Guatemala and Honduras. Funding is provided by the State Department.
		MS-13 National Gang Task Force	To combat the transnational and national criminal activities of the MS-13 and 18th Street gangs, the FBI established this task force in 2005. The task force coordinates local, state, federal, and international FBI-led investigations of those gangs. It also manages the operation of the TAG.
		Central American Law Enforcement Exchange	This is an exchange program for law enforcement personnel from Central America and the United States to share best practices, establish contacts, and receive antigang training. The first exchange occurred with four gang officers from El Salvador's national police traveling to Los Angeles where they spent 30 days with gang officers of the Los Angeles Police and Sheriff's Departments. The Los Angeles officers subsequently visited El Salvador for 30 days. The FBI has modified the program to a 3-week session that includes training at the FBI Academy. In the second exchange, which occurred in March 2009, 28 officers from the United States, El Salvador, Honduras, and Guatemala participated.

**Appendix III: Federal Agencies' Programs to  
Address Transnational Gangs with  
Connections to Central America**

<b>Lead implementing agency</b>	<b>Country</b>	<b>Effort or project</b>	<b>Description of effort/project</b>
		Central American Intelligence Program	The objective of this program is to share intelligence, standardize reports and other intelligence products, and minimize the communication gaps between countries that allow gang members to operate across borders. The program is a joint initiative of the FBI and the State Department and consists of criminal-intelligence analysts from the United States, El Salvador, Honduras, Guatemala, Mexico, and Canada who work on gang-related matters.
		Criminal History Information Program	The FBI, in conjunction with U.S. Immigration and Customs Enforcement (ICE), is working to implement this project to transmit the criminal histories to law enforcement authorities in El Salvador, Guatemala, and Honduras of deportees being returned to those countries. Under this program, ICE is to provide the FBI with a list of the criminals from these countries detained by ICE with final orders of removal. Next, FBI analysts compile the criminal histories of these detainees and transmit the information to law enforcement officials in each country. As of November 2009, the FBI was still in the process of hiring analysts and negotiating with the El Salvadoran government—the first country where the program will be implemented.
U.S. Immigration and Customs Enforcement (ICE)	Multiple countries in Central America	Electronic Travel Document System	This is an internet-based system to facilitate the issuance of travel documents for the removal of illegal aliens, including gang members. ICE has implemented the system in El Salvador, Guatemala, and Honduras.
		Operation Community Shield	This is an ICE initiative to combat transnational gangs by arresting and removing from the United States criminal aliens who are gang members. ICE works with state and local law enforcement agencies to investigate transnational gang members who are foreign-born and in the country illegally or have been involved in crimes.
	Honduras	Operation Community Shield—Honduras	ICE established Operation Community Shield-Honduras in January 2010 in conjunction with the Department of State. This specialized law enforcement unit in Honduras represents ICE's first international antigang task force and consists of four Honduran National Police gang enforcement officers and one ICE Special Agent. This specialized unit is charged with developing actionable gang intelligence to initiate and support current gang investigations in Honduras and the United States.
Department of State	El Salvador	Security Threat Intelligence Unit Program	The purpose of this initiative is to collect, analyze, exploit and share gang intelligence within the prison system. According to the State Department, an effective intelligence program is essential in curtailing criminal activity both inside and outside the prisons since several thousand gang members, including much of the key leadership, are incarcerated throughout Central America.
	Multiple countries in Central America	U.S.- Central American Integration System <sup>a</sup> Dialogue	This initiative includes talks between the United States and countries participating in the Central American Integration System to promote regional coordination against transnational threats such as criminal gangs.

**Appendix III: Federal Agencies' Programs to  
Address Transnational Gangs with  
Connections to Central America**

<b>Lead implementing agency</b>	<b>Country</b>	<b>Effort or project</b>	<b>Description of effort/project</b>
		Antigang Training	This initiative provides training to Central American law enforcement officials through the U.S.-sponsored International Law Enforcement Academy in El Salvador. Training includes investigative techniques, prosecution, witness protection, rehabilitation, and management of gang members in prison. Participants have included police, prosecutors, judges, prison staff, border agents, and prevention and rehabilitation officials.
		Regional Corrections Advisor for Central America	The Regional Corrections Advisor serves as the regional corrections expert on the full range of corrections issues in Central America for the Department of State's Bureau of International Narcotics and Law Enforcement. The advisor coordinates corrections programs with the Bureau of International Narcotics and Law Enforcement's Senior Corrections Advisor and the Regional Gangs Advisor for Central America. The advisor provides technical corrections expertise, policy guidance, technical assistance and training on behalf of the Bureau of International Narcotics and Law Enforcement for regional governments.
		Corrections Officer Exchange Program	Several state corrections departments have agreed to participate in this program for the identification and exchange of best practices with countries in the region.
U.S. Agency for International Development (USAID)	El Salvador	Justice Sector Reform	The purpose of this program is to provide technical assistance and training to strengthen justice-sector institutions in El Salvador that will allow them to improve the investigation, prosecution, and prevention of crimes including those committed by gangs. The recipients of USAID's assistance efforts include the El Salvadoran Attorney General and Public Defender's offices, the National Civilian Police, judges, and the courts.
		Dispute Mediation Centers Network	According to USAID, this program improves access to the justice system and promotes a culture of lawfulness and nonviolence by resolving conflicts through peer mediation. Through this program, USAID seeks to improve the reliability and effectiveness of the mediation centers through training, technical assistance, and public outreach. In implementing this program, USAID is working with the El Salvadoran Public Defender's Office, the Attorney General's Office, courts, schools, and selected municipalities. The program targets schools in areas with populations of students most at risk to be recruited to join gangs, in order to teach those youth how to resolve differences without resorting to violent practices or joining violent groups such as street gangs. USAID is also implementing a similar program in Nicaragua.
		Community-Based Crime and Violence Prevention Program	Under this program, USAID partners with local-government officials, community leaders, and private groups to develop prevention plans in selected municipalities at high risk for gang activity. Specifically, 10 high-risk communities in five municipalities are participating in the development of crime prevention projects such as recreational infrastructure, sports activities, and vocational and arts centers.

**Appendix III: Federal Agencies' Programs to  
Address Transnational Gangs with  
Connections to Central America**

<b>Lead implementing agency</b>	<b>Country</b>	<b>Effort or project</b>	<b>Description of effort/project</b>
		National Gang Prevention Policy	USAID provides technical assistance and training to strengthen El Salvador's National Council for Public Security to formulate national-level policy on gang prevention and coordinate prevention activities throughout the country. USAID intends for this program to increase coordination between the national and local governments and bring together law enforcement officials, judges, and prosecutors to counter gangs and gang-related violence. Beneficiaries of this program are the government of El Salvador and selected municipalities throughout the country.
	Guatemala	Youth Centers	To reach at-risk youth, USAID started centers to provide a safe environment and access to sports activities and skills training. USAID is implementing this program through partnerships with faith-based organizations, the Rotary Club, nongovernmental organizations, and various municipalities.
		Youth Challenge Program	According to USAID, this program provides opportunities to develop new skills and offer free-time alternatives that reduce the vulnerability to gang recruitment for over 2,500 at-risk youth. This program builds on the results achieved under the Youth Alliance Program (responsible for "Youth Centers" above) and seeks to open additional centers and provide job placement to former gang members. This program partners faith-based organizations, the Rotary Club, small nongovernmental organizations, and municipalities.
		Community-Based Policing	USAID has sponsored this program in Villa Nueva, Guatemala, as part of an effort to reduce crime in the community—including crimes related to gang activity. According to USAID, the most important program activities include a diagnostic assessment to improve the effectiveness of the national police, police training, and youth crime prevention activities—including those related to involvement with gangs. For example, the program facilitated a number of interventions that targeted youth at risk of joining street gangs. Recipients of assistance under this program include police, prosecutors, and members of the judiciary in addition to the communities in which they all serve.
		24-hour Courts	According to USAID, the purpose of the 24-hour courts is to provide increased efficiency in processing criminal cases—including those involving criminal gangs over which these courts have jurisdiction. This program is a joint effort of four justice institutions in Guatemala—courts, prosecutors, public defenders, and police.
		United Nations Commission against Impunity in Guatemala	Under this program, USAID supports the commission through direct funding and training of Guatemalan prosecutors and judges in the correct use of the law against organized criminal networks that have penetrated Guatemala.
		Crimes Against Life Unit	This program has provided for the reorganization of the Guatemala City Crimes Against Life Unit, procedural changes, and better case screening that has allowed the unit to increase prosecutions of homicides, including those related to gang violence.
		Desafio 100	According to USAID, this program is to help change public perception of reformed gang members. Desafio 100 provides a partnership between USAID and the business community in Guatemala to provide 100 former gang members with jobs and special training.

**Appendix III: Federal Agencies' Programs to  
Address Transnational Gangs with  
Connections to Central America**

<b>Lead implementing agency</b>	<b>Country</b>	<b>Effort or project</b>	<b>Description of effort/project</b>
		National Gang Prevention Policy	Under this program, USAID will promote and assist Guatemalan institutions to develop and implement a national policy to institutionalize and promote sustainability of crime prevention programs for youth at risk of joining gangs. Participants in this program include the government of Guatemala and the judiciary.
	Honduras	Education for All	Under this program, USAID partners with the Honduran Ministry of Education, schools, communities, and other donors to provide education and vocational training for at-risk youth that will result in alternatives to joining gangs. Volunteer facilitators with diverse backgrounds implement the program at learning centers situated in factories, businesses, schools, and community centers throughout the country.
		Civil Rights and Values for Youth	USAID intends for this program to provide civic education and problem-solving skills for 20,000 at-risk youth from disadvantaged populations in Honduras. According to USAID, students are less likely to engage in criminal activities if they are educated in values and reintegrated into society. Program participants receive training in the fundamentals of civil society, volunteerism, a free-market economy, and democratic participation. USAID's program partners include nongovernmental organizations, Regional Ministry of Education Coordinators, Peace Corps volunteers, and other local partners in order to target vulnerable youth subject to violence, migration, gang recruitment, and school desertion.
		Municipal Conciliation Centers	USAID intends for this program to promote crime and violence prevention through alternative dispute resolution. The program has set up seven centers throughout Honduras.
		National Gang Prevention Policy	Under this program, USAID partners with the Government of Honduras, local governments, the judiciary, and the private sector to develop a national policy framework for supporting municipal and community-led initiatives that address the root causes of gangs. These initiatives include job placement and infrastructure projects that support community efforts to address root problems and improve security such as educational facilities, street lighting, and safer community spaces.
	Multiple countries in Central America	Regional Gang Prevention Program, Central American Region	The purpose of this program is to support development of innovative gang prevention programs through small grants to various organizations. It will support public, private, and civil society organizations to implement gang prevention programs for at-risk youth and ex-gang members. This program address gang violence in three phases: (1) initiatives to prevent at-risk youth from joining gangs, (2) offer opportunities to entice youth to leave gangs, and (3) rehabilitation efforts for ex-gang members to prevent them from returning to crime. Recipients of assistance under this program include the governments of Guatemala, El Salvador, and Honduras along with the judiciaries in these countries.

Source: GAO analysis of information provided by each applicable agency.

<sup>a</sup>The Central American Integration System is a regional entity created by Central American countries to, among other things, promote regional coordination against transnational threats such as criminal gangs.

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# Appendix IV: Federal Agencies' Entities and Mechanisms for Coordinating Transnational Antigang Efforts

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Federal agencies have coordinated their programs to combat transnational gangs through working groups at the interagency level, coordinating groups within Central American countries, and federally led antigang task forces at the local level. For example, at the headquarters level, through the National Gang Intelligence Center (NGIC), representatives of the Department of Justice's (DOJ) Federal Bureau of Investigation (FBI); Drug Enforcement Administration (DEA); Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF); and Bureau of Prisons (BOP), among other components, and the Department of Homeland Security's (DHS) U.S. Immigration and Customs Enforcement (ICE) and U.S. Customs and Border Protection (CBP) coordinate and share information on gangs that are a threat to U.S. communities. Table 5 provides additional information about headquarters-level entities' coordination of antigang efforts. These coordinating entities have different roles and responsibilities, but in general, they serve as mechanisms for deconflicting cases;<sup>1</sup> providing law enforcement agencies with information on gangs and gang activities, including transnational gangs; and coordinating participating agencies' strategies and task forces.

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<sup>1</sup>"Deconfliction" is the coordination and information sharing among law enforcement agencies on multijurisdictional investigations to help ensure officer safety and the effective use of resources.

**Appendix IV: Federal Agencies' Entities and Mechanisms for Coordinating Transnational Antigang Efforts**

**Table 5: Headquarters-Level Entities Focused on Coordination of Antigang Efforts**

Entity	Year established	Lead agency or office	Participating agencies and offices	Staff	Coordination/information-sharing role
Anti-Gang Coordination Committee	2006	DOJ Office of Deputy Attorney General	DOJ: FBI, ATF, U.S. Marshals Service (USMS), DEA, BOP, Executive Office for United States Attorneys (EOUSA), Office of Juvenile Justice and Delinquency Prevention, National Drug Intelligence Center, Civil Rights Division, Criminal Division, Office of Legal Policy, Budget Office, Office of Legislative Affairs, Office of Public Affairs, Justice Management Division, Office of Justice Programs, Attorney General's Advisory Committee, Office of Community Oriented Policing Services, Tax Division, National Gang Targeting, Enforcement, and Coordination Center (GangTECC), NGIC, and National Institute of Justice DHS: ICE, CBP Department of the Treasury: Internal Revenue Service	None	Organize DOJ's efforts to combat gangs, including to provide recommendations to Deputy Attorney General on all matters related to antigang activities, review applications for funds for gang-related task forces from U.S. Attorneys and approve creation of violent-crime task forces around the country.
National Gang Intelligence Center (NGIC)	2005	DOJ FBI	DOJ: FBI, DEA, ATF, USMS, BOP, and National Drug Intelligence Center DHS: ICE, CBP Department of Defense: National Guard	About 22, including a director, two deputy directors, 13 FBI intelligence analysts, and at least one analyst detailed from each participating agency	Provide law enforcement agencies with information and analysis of federal, state, and local law enforcement intelligence focusing on gangs that pose a significant threat to U.S. communities.
National Gang Targeting, Enforcement, and Coordination Center (GangTECC)	2006	DOJ Criminal Division	DOJ: FBI, DEA, ATF, BOP, USMS, and Criminal Division DHS: ICE	About 14, including a director, deputy director, and agents detailed from participating agencies	Coordinate and deconflict overlapping gang-related investigations and prosecutions and serve as a coordinating center for multijurisdictional gang investigations.
MS-13 National Gang Task Force	2004	DOJ FBI	DOJ: FBI	Supervisor, four FBI supervisory special agents, and six FBI analysts	Coordinate the development of multijurisdictional FBI investigations of MS-13 and 18th Street gangs, including transnational investigations, into national-level investigations and prosecutions.

**Appendix IV: Federal Agencies' Entities and Mechanisms for Coordinating Transnational Antigang Efforts**

<b>Entity</b>	<b>Year established</b>	<b>Lead agency or office</b>	<b>Participating agencies and offices</b>	<b>Staff</b>	<b>Coordination/information-sharing role</b>
Transnational Antigang unit (TAG)	2007	DOJ FBI	DOJ FBI, El Salvador's Civilian National Police	Two FBI agents 30 Salvadoran police officials and staff	Provide information on MS-13 and 18th Street gang members and their criminal activities in the United States and Central America. Information is shared between U.S. law enforcement agencies and the Salvadoran National Police. The TAG was created and implemented by the MS-13 National Gang Task Force to assist in combating the growing threat posed by transnational gangs and drug cartels in Central America.
Gang Unit	2006	DOJ Criminal Division	DOJ Criminal Division	12 prosecutors	Coordinate with local U.S. Attorneys' Offices on legal issues and multidistrict gang cases and work with law enforcement agencies to achieve coordinated prevention and enforcement strategies.

Source: GAO analysis of DOJ and DHS information.

In localities we contacted, law enforcement agencies obtained assistance from the antigang coordinating entities to support their investigations of MS-13 and 18th Street gangs and gang members. For example, in one location we visited, the National Gang Intelligence Center provided an analyst to an FBI antigang task force to help that task force analyze MS-13 gang data for an ongoing investigation. At another location, the FBI antigang task force obtained assistance from the TAG unit in El Salvador to help identify two MS-13 gang members who were in a Salvadoran prison and communicated with MS-13 gang members in the United States to direct the gang members' criminal activities. Additionally, DOJ's Gang Unit has assisted with the prosecution of MS-13 and 18th Street gang cases in the United States. For example, in one location we contacted, the Gang Unit assisted the local U.S. Attorney's Office with the prosecution of a

gang case under the Racketeer Influenced and Corrupt Organizations Act.<sup>2</sup> The Gang Unit provided this assistance because, according to the U.S. Attorney's Office, the office did not have enough experienced attorneys who were familiar with using the Act to prosecute gang members.

At the field level, federal law enforcement agencies utilize task forces to coordinate their gang enforcement efforts. For example, the FBI's Violent Gang Safe Streets Task Forces coordinate with federal, state, and local law enforcement to investigate all active gang threats, but have conducted investigations on MS-13 and 18th Street gangs across the country. In locations we contacted, including Omaha, Nebraska; Los Angeles, California; and Charlotte, North Carolina, FBI task forces investigated MS-13 gangs and determined that gang members in those locations were communicating with gang members in El Salvador.<sup>3</sup> Similar to the FBI's Violent Gang Safe Street Task Forces, ATF's Violent Crime Impact Teams, which partner ATF with federal, state, and local law enforcement agencies to reduce firearms-related violent crime including gang crime, may investigate gangs with transnational connections in specific locations.<sup>4</sup> For example, in 2007 ATF led an investigation in Baltimore, Maryland, involving MS-13 gang members who committed murder and robbery. Through its task force, ATF coordinated this investigation with other agencies including FBI, ICE, the United States Attorneys' Office, local police agencies, and the Salvadoran national police to investigate and

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<sup>2</sup>While the Racketeer Influenced and Corrupt Organizations Act was originally enacted to dismantle organized crime groups such as the Mafia, prosecutors have successfully used it to bring cases against members of organized gangs. The Act prohibits the commission of a pattern of racketeering activity to invest in, maintain an interest in, or participate in, directly or indirectly, an enterprise, the activities of which affect interstate or foreign commerce; it also prohibits conspiracy to commit any of these activities. *See* 18 U.S.C. §§1961-68.

<sup>3</sup>The FBI's Violent Gang Safe Streets Task Forces are part of the FBI's Safe Streets Violent Crime Initiative which was designed to allow each field office to address violent street gangs and drug-related violence through FBI-sponsored task forces. The task forces were established in 1992 to serve as long-term and coordinated teams of federal, state, and local law enforcement officers and prosecutors. These task forces focus on disrupting and dismantling the most violent and criminally active gangs in the United States. According to the FBI, as of August 2009, 153 Safe Streets Task Forces are focused on violent gangs in 54 FBI field offices.

<sup>4</sup>ATF's Violent Crime Impact Teams were established in 2004 through partnerships with state and local agencies to reduce firearms-related violent crime including violent gang crime in small geographic areas experiencing an increase in violent crime. According to ATF, as of April 2009, 31 Violent Crime Impact Teams were operating in locations across the country.

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**Appendix IV: Federal Agencies' Entities and Mechanisms for Coordinating Transnational Antigang Efforts**

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prosecute these gang members. In addition, through Operation Community Shield, ICE works primarily with state and local law enforcement agencies to investigate gangs whose members are foreign-born or in the United States illegally, or both, or have been involved in crimes with a nexus to the U.S. borders.<sup>5</sup>

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<sup>5</sup>ICE's Operation Community Shield was established in 2005 through partnerships with state and local law enforcement agencies as a national law enforcement initiative that targets violent transnational street gangs through the use of ICE's broad law enforcement powers to identify, locate, arrest, prosecute, and ultimately remove gang leaders, members, and associates from communities. Under this initiative, investigations focus on transnational street gangs whose members are subject to ICE's immigration and customs authorities because the members are foreign-born or in the country illegally, or both, or have been involved in crimes with a nexus to the U.S. borders (i.e., narcotics trafficking and human trafficking).

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# Appendix V: Scope and Methodology

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To determine to what extent the U.S. federal government has developed a strategy to combat transnational gangs with connections to Central America, we examined the interagency strategy, called the Strategy to Combat the Threat of Criminal Gangs from Central America and Mexico (the Strategy), and compared the contents of the Strategy to select criteria in our prior work on desirable characteristics of an effective national strategy, including (1) clear purpose, scope, and methodology; (2) discussion of problems, risks, and threats; (3) desired goals, objectives, activities, and performance measures; and (4) delineation of roles and responsibilities.<sup>1</sup> In regard to the National Security Council (NSC), we discussed its role in developing and implementing the Strategy with a mix of the departments and agencies that participated in the NSC's International Organized Crime Policy Coordinating Committee (IOCPCC) such as the Department of State (State), the Department of Justice (DOJ), and the U.S. Agency for International Development (USAID).<sup>2</sup> We also examined the roles and activities of the various federal agencies under the Strategy including DOJ, the Department of Homeland Security (DHS), State, the Department of Defense (DOD), the Department of the Treasury (Treasury), and USAID and their component agencies. To do this we reviewed antigang program documents and interviewed officials from DOJ, DHS, State, DOD, Treasury, and USAID in headquarters as well as component agencies such as the Federal Bureau of Investigation (FBI) within DOJ and U.S. Immigration and Customs Enforcement (ICE) within DHS to obtain their views about the framework, including the different categories, of the Strategy.

To determine how U.S. federal agencies have implemented programs to carry out the Strategy and combat transnational gangs, coordinated these programs, and assessed their results, we examined a mix of DOJ's, DHS's, State's, USAID's, and their component agencies' plans, performance data, reports, and assessments for fiscal years 2006 through 2009. We compared federal agencies' efforts to coordinate and share information on their

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<sup>1</sup>GAO, *Combating Terrorism: Evaluation of Selected Characteristics in National Strategies Related to Terrorism*, [GAO-04-408T](#) (Washington, D.C.: Feb. 3, 2004), and GAO, *Rebuilding Iraq: More Comprehensive National Strategy Needed to Help Achieve U.S. Goals*, [GAO-06-788](#) (Washington, D.C.: July 11, 2006). In addition to these four characteristics, our prior work identified two other characteristics which were outside the scope of our review: identification of future costs and resources needed and discussion of the strategy's integration with other strategies, entities, or efforts.

<sup>2</sup>During the course of our review, we attempted to meet with officials of the NSC to discuss the Strategy and its implementation, but were unsuccessful.

transnational antigang programs to criteria in our prior work on effective interagency collaboration and results-oriented government.<sup>3</sup> To assess the reliability of statistical information we obtained, such as data on program performance and outcomes, we discussed the sources of the data with agency officials and reviewed documentation regarding the compilation of data. We determined that the data were sufficiently reliable for the purposes of this report. In addition, we examined federal agencies' funding allocated to transnational antigang programs. In particular, we reviewed agencies' budget requests for fiscal years 2008 through 2010; appropriations acts for DOJ, DHS, State, and USAID for those fiscal years; and expenditure and other plans for the Mérida Initiative.<sup>4</sup> To obtain information on federal efforts to combat the gangs as well as the extent to which the agencies coordinated their efforts with other agencies, we interviewed a mix of federal, state, and local law enforcement officials in seven U.S. locations—Baltimore, Maryland; Charlotte, North Carolina; Laredo and McAllen, Texas; Los Angeles, California; Nashville, Tennessee; and Omaha, Nebraska—and U.S. federal, foreign, and three nongovernmental agencies' officials in El Salvador and Guatemala. To understand the process of how ICE handles and removes gang members who are in the United States illegally, we visited ICE's South Texas Detention Facility in Pearsall, Texas, and interviewed officials with ICE's Office of Detention and Removal Operations. We selected the U.S. locations and El Salvador and Guatemala based on a mix of criteria that included locations (1) along the U.S. borders, (2) where U.S. federal agencies have implemented antigang programs, and (3) where federal law enforcement agencies have conducted operations involving gangs with connections to Central America. For our site visits to foreign locations, we consulted with officials of federal agencies to identify in which foreign locations their agencies had efforts underway. Of the countries in the region, agency officials suggested we visit El Salvador and Guatemala because more antigang initiatives were underway and further along as compared to efforts in other countries. Given this, we selected these countries to obtain more information on these efforts and evaluate the effect they have had on the gang problem. We selected the South Texas Detention Facility because it was the facility identified by ICE officials for

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<sup>3</sup>GAO, *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005).

<sup>4</sup>Consolidated Appropriations Act, 2010, Pub. L. No. 110-117, 123 Stat. 3034 (2009); Omnibus Appropriations Act, 2009, Pub. L. No. 111-8, 123 Stat. 524; Supplemental Appropriations Act, 2008, Pub. L. No. 110-252, 122 Stat. 2323.

handling the most gang members awaiting removal. More specifically, in the U.S. locations we interviewed officials from some of the following federal agencies: the FBI; Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF); Drug Enforcement Administration (DEA); U.S. Attorneys' Office; ICE; and in Laredo, Texas, U.S. Customs and Border Protection (CBP). We also interviewed a mix of state and local law enforcement officials in Charlotte, North Carolina; Los Angeles, California; Nashville, Tennessee; and Omaha, Nebraska. In Guatemala and El Salvador, we interviewed a mix of officials from the following federal agencies: DOJ's Office of International Affairs, FBI, DEA; ICE; State; USAID; the State-sponsored International Law Enforcement Academy; and DOD. We also interviewed a mix of officials from Salvadoran and Guatemalan government agencies, including the countries' national police and the Salvadoran prosecutors' office. We also observed some of the activities related to USAID-sponsored prevention efforts in El Salvador and Guatemala such as the youth centers and interviewed participants, local government officials involved in the efforts, and members of the community about their views and the effect of the programs. Additionally, we interviewed officials from intergovernmental and nongovernmental organizations such as the Organization of American States, Washington Office on Latin America, the Central American Coalition for Prevention of Youth Violence, the Centro de Formacion y Orientacion, and the Instituto Universitario de Opinion Publica to obtain their perspectives on the gang problem in Central America. We also interviewed officials from contractors and companies such as Creative Associates International, Inc., and Pepsi Co. that have partnered with USAID or participated in USAID efforts to establish gang prevention programs and provide employment opportunities for ex-gang members in countries such as El Salvador and Guatemala. The information we obtained from interviewing officials in the U.S. and Central American locations cannot be generalized across all locations in the United States or Central America. However, because we selected these locations based on a variety of factors, they provided us with an overview of the agencies' antigang programs, examples of coordination and measurements to assess results, and any challenges with implementation of the programs.

We conducted this performance audit from April 2008 through April 2010 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

# Appendix VI: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

April 9, 2010

Ms. Eileen R. Larence  
Director  
Homeland Security and Justice Issues  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Larence:

RE: Draft Report GAO-10-395, Combating Gangs: Federal Agencies Have Implemented a Central American Gang Strategy, but Could Strengthen Oversight and Measurement of Efforts (Engagement Code 440702)

The U.S. Department of Homeland Security (DHS) appreciates the opportunity to review and comment on the draft report referenced above. The Government Accountability Office (GAO) makes two recommendations, one of which specifically is addressed to DHS.

The draft report recommends that the Attorney General and the Secretary of DHS reach agreement on the U.S. Immigration and Customs Enforcement's (ICE) role and participation in the joint U.S.-Salvadoran Transnational Anti-Gang (TAG) unit in order to strengthen federal agencies' coordination of anti-gang efforts and maximize use of federal law enforcement resources in El Salvador. We concur with the recommendation. Officials within ICE's Office of International Affairs, Office of Investigations and Office of Principal Legal Advisor have reviewed and revised the Federal Bureau of Investigation's (FBI) TAG memo to clarify ICE/FBI roles and responsibilities within the TAG in El Salvador. Currently a memorandum of understanding is being drafted.

The second recommendation is directed to the Special Assistant to the President for National Security Affairs. GAO recommends that the Special Assistant in conjunction with the Department of Justice, DHS, State, U.S. Agency for International Development, and the Department of Defense revise the *Strategy to Combat the Threat of Criminal Gangs from Central America and Mexico*. DHS officials defer to the Special Assistant to the President. DHS remains committed to assisting the Special Assistant and interagency partners in strengthening oversight and accountability for implementing the strategy and related revisions. This would include participating in a multi-agency oversight mechanism, which would use performance measures to report progress in implementation.

Technical comments have been provided previously under separate cover.

Sincerely,

*Michael E. McPoland*  
for Jerald E. Levine  
Director  
Departmental GAO/OIG Liaison Office

# Appendix VII: Comments from the Department of Justice



U.S. Department of Justice

Office of the Deputy Attorney General

*Senior Counsel to the Deputy Attorney General  
Chair of the Attorney General's Anti-Gang Coordination Committee*

*Washington, D.C. 20530*

April 13, 2010

Eileen R. Larence  
Director  
Homeland Security and Justice Team  
Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Larence:

Thank you for the opportunity to review the U.S. Government Accountability Office (GAO) draft Report on Combating Gangs (April 2010) and for the opportunity to respond on behalf of the U.S. Department of Justice (DOJ). In the report, GAO recommends DOJ and the U.S. Department of Homeland Security (DHS) reach an agreement on the composition of an anti-gang unit located in El Salvador, and the roles of its members. DOJ fully agrees with this recommendation and has already taken steps to facilitate such an agreement.

As part of its gang strategy for the region, the FBI intends to create similar anti-gang units in Guatemala and Honduras. To strengthen federal agencies' coordination of anti-gang efforts and maximize use of federal law enforcement resources in the region, DOJ strongly believes that any agreement to ensure DHS's participation in the current unit, located in El Salvador, should also address its participation in the forthcoming units. We are working to reach this broader agreement for our anti-gang activities in the region.

Sincerely,

  
Jennifer Shasky Calvery

# Appendix VIII: Comments from the United States Agency for International Development



**USAID**  
FROM THE AMERICAN PEOPLE

APR - 9 2010

Ms. Eileen R. Larence  
Director Homeland Security and Justice  
U.S. Government Accountability Office  
Washington, DC 20548

Dear Ms. Larence:

I am pleased to provide the formal response of the U.S. Agency for International Development (USAID) to the GAO draft report "Combating Gangs: Federal Agencies Have Implemented a Central American Gang Strategy, but Could Strengthen Oversight and Measurement of Efforts" (GAO-10-395, engagement 440702).

The enclosed USAID comments are provided for incorporation with this letter as an appendix to the final report.

Thank you for the opportunity to respond to the GAO draft report and for the courtesies extended by your staff in the conduct of this audit review.

Sincerely,

A handwritten signature in black ink that reads "Drew W. Luten".

Drew W. Luten  
Senior Deputy Assistant Administrator  
Bureau for Management

Enclosure: a/s

U.S. Agency for International Development  
1300 Pennsylvania Avenue, NW  
Washington, DC 20523  
[www.usaid.gov](http://www.usaid.gov)

USAID COMMENTS ON GAO DRAFT REPORT No. GAO-10-395

USAID appreciates the GAO's thorough investigation of the question of U.S. Government interagency coordination to address the problem of crime and violence related to gangs operating between the United States and Central America. USAID is committed to furthering the U.S. Government's anti-gang strategy and welcomes the GAO's attention to these critical issues; in addition to its targeted anti-gang programming, USAID has long been engaged in institutional capacity building of the justice sector and violence prevention in Central America. We also appreciate the GAO's recognition of our efforts toward monitoring and impact evaluation of our anti-gang program, and acknowledge the importance of increased inter-agency coordination to bolstering USG efforts against the threat of criminal gangs both in Central America and within the U.S.

As the GAO noted, the gang problem is multifaceted, dynamic, and transnational in nature. As such, concerned actors continue to struggle with a dearth of reliable, accurate data on questions such as the numbers and demographics of gang members, or what percentage of crimes in Central America can truly be attributed to criminal gangs. This lack of reliable data presents a hurdle to measuring the overall impact of USG efforts to combat gang-related crime and violence. However, our progress has been significant. As noted in the report, USAID among others has helped to fill this information gap through activities such as the 2006 Central America and Mexico Gangs Assessment and our current efforts to measure impact of our Central American crime and violence prevention programs.

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# Appendix IX: GAO Contact and Staff Acknowledgments

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## GAO Contact

Eileen R. Larence, (202) 512-8777 or larencee@gao.gov

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## Staff Acknowledgments

In addition to the contact named above, Rebecca Gambler, Assistant Director; Heather Dowey; Sally Gilley; Mike Harmond; Chris Hatscher; Michael Lenington; Amanda Miller; Janet Temko; and Adam Vogt made significant contributions to this report.

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