



New York/New Jersey

High Intensity Drug Trafficking Area Drug Market Analysis

June 2007

U.S. Department of Justice

Preface

This assessment provides a strategic overview of the illicit drug situation in the New York/New Jersey (NY/NJ) High Intensity Drug Trafficking Area (HIDTA), highlighting significant trends and law enforcement concerns related to the trafficking and abuse of illicit drugs. The report was prepared through detailed analysis of recent law enforcement

reporting, information obtained through interviews with law enforcement and public health officials, and available statistical data. The report is designed to provide policymakers, resource planners, and law enforcement officials with a focused discussion of key drug issues and developments facing the NY/NJ HIDTA.

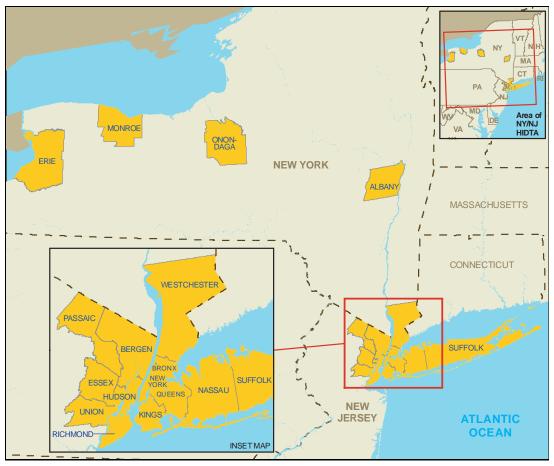


Figure 1. New York/New Jersey High Intensity Drug Trafficking Area.

This assessment is an outgrowth of a partnership between the NDIC and HIDTA Program for preparation of annual assessments depicting drug trafficking trends and developments in HIDTA Program areas. The report has been vetted with the HIDTA, is limited in scope to HIDTA jurisdictional boundaries, and draws upon a wide variety of sources within those boundaries.

Strategic Drug Threat Developments

- Mexican drug trafficking organizations (DTOs) are transporting a larger percentage of the cocaine and heroin available in the NY/NJ HIDTA region and are taking a more significant role in distributing drugs in the area. Colombian DTOs have lessened their direct involvement in transportation and distribution duties, creating this opportunity for Mexican DTOs to increase their market share. Over the past 12 to 16 months, Mexican DTOs' growing role has led to an influx of higher-purity crystal methamphetamine, a larger volume of drugs transported overland (mostly from the Southwest Border area), and a significant decline in drugs transported to the HIDTA region from Florida.
- Canada-based DTOs have increased the size of the hydroponic marijuana loads that they ship into the HIDTA region through western New York ports of entry (POEs). Previously, the loads weighed several hundred pounds and were commonly transported in private vehicles; now, most weigh multithousand pounds and are transported in commercial vehicles. This may indicate that DTOs in eastern Canada are expanding to more markets in the United States.
- Syracuse and Albany, New York, have become major transshipment points for Canadian hydroponic marijuana smuggled through the St. Regis Mohawk (Akwesasne) Reservation. Dominican traffickers drive from New York City to meet with Native American smugglers from the reservation to purchase marijuana at these locations.
- Street gang involvement in retail-level distribution of cocaine and heroin is rising, particularly in the Upstate² New York HIDTA counties. This activity has led to increased violence in the region over the past several years.

Drug Trafficking Organizations, Criminal Groups, and Gangs

Drug trafficking organizations are complex organizations with highly defined command-and-control structures that produce, transport, and/or distribute large quantities of one or more illicit drugs.

Criminal groups operating in the United States are numerous and range from small to moderately sized, loosely knit groups that distribute one or more drugs at the retail and midlevels.

Gangs are defined by the National Alliance of Gang Investigators' Associations as groups or associations of three or more persons with a common identifying sign, symbol, or name, the members of which individually or collectively engage in criminal activity that creates an atmosphere of fear and intimidation.

- The purity of South American (SA) heroin, the predominant type available in the HIDTA region, has decreased slightly. Newark, which previously led the nation in SA heroin purity, now ranks behind Philadelphia, Pennsylvania, and New York City. SA heroin purity has been decreasing in the HIDTA since 2003; however, this is the first time Newark did not lead the nation in SA heroin purity.
- Despite reported decreases in SA heroin purity, heroin poses an increasing threat to the HIDTA region. Abuse, particularly among young people, is increasing. Additionally, abuse is spreading from lower-income neighborhoods to middle- and upper-income neighborhoods. The reason for this increase in heroin abuse is largely unknown by law enforcement and public health officials at this time; however, some believe it may be linked to the fact that heroin is now commonly snorted, and the stigma of injecting the drug is less frequently associated with its abuse.

^{1.} Law enforcement and treatment authorities in the High Intensity Drug Trafficking Area (HIDTA) region use the term "crystal methamphetamine" to refer both to powder methamphetamine that has been recrystallized and high-purity ice methamphetamine. Recrystallized powder is the form most commonly found in the HIDTA.

^{2.} For the purposes of this report, "Upstate New York" refers to the area of New York State outside the area of New York City, Long Island, and Westchester County. Areas referred to as being located in western New York (Buffalo, etc.) are included in Upstate New York.

HIDTA Overview

The NY/NJ HIDTA region encompasses 17 counties located throughout New York and in northeastern New Jersey. The New York portion consists of the five boroughs of New York City (Brooklyn, the Bronx, Manhattan, Queens, and Staten Island), the outer two counties of Long Island (Nassau and Suffolk), Westchester County (just north of New York City), and four counties in Upstate New York that were recently added to the HIDTA region (Albany, Erie, Monroe, and Onondaga³). The New Jersey portion consists of Bergen, Essex, Hudson, Passaic, and Union Counties. Approximately 21 million individuals—more than 7 percent of all U.S. residents—reside in the HIDTA region.

The HIDTA region includes the most ethnically diverse urban area in the nation, allowing foreignborn criminals to easily blend in and operate throughout the area. Individuals from over 100 countries reside in the New York metropolitan area, and almost 2 million of the approximately 8 million New York City residents are foreign-born. Significant numbers of people from drug source and transit countries reside in various parts of the HIDTA region. For example, the Jackson Heights section of Queens contains the largest Colombian community outside Colombia, and the Washington Heights section of Upper Manhattan is home to a large concentration of Dominican-born residents.

Drug Threat Overview

The NY/NJ HIDTA region is a national distribution center for illicit drugs, principally cocaine, heroin, and marijuana. Multikilogram to ton quantities of these drugs are transported to the region by air, land, and sea conveyances from drug source and transit countries such as Canada, Colombia, the Dominican Republic and Mexico as well as from other domestic locations, including Florida,

Puerto Rico, and the Southwest. Once in the region, drug shipments typically are broken down into smaller quantities for further distribution within the region and transported to cities throughout the Northeast, Southeast, and Midwest.

Cocaine and heroin pose the most significant threats to the HIDTA region. Cocaine represents the greatest threat to the New York section of the HIDTA region, while heroin represents the greatest threat to the New Jersey section. Cocaine is frequently abused throughout the area, and crack cocaine distribution poses an increasing threat to New York City and the Upstate New York counties because this drug is becoming the primary source of income for several violent street gangs. Heroin is frequently abused in the HIDTA region, and its abuse is rapidly spreading to new and younger populations. Heroin-related admissions to publicly funded treatment facilities in the region far exceed those of any other drug, and heroin is increasingly being milled⁵ in the HIDTA region.

Other illegal drugs pose a serious threat to the NY/NJ HIDTA. Marijuana is the most commonly abused drug in the region; Canadian hydroponic marijuana poses a serious threat to the Upstate New York HIDTA counties. This high-potency marijuana is increasingly available and abused in the HIDTA's upstate counties, particularly among young people and college students. Crystal methamphetamine poses a lesser, yet increasing, threat to the HIDTA region; the drug is rising in popularity and may be spreading to a wider abuser population. Recent law enforcement seizures indicate that the number of small clandestine methamphetamine laboratories in the HIDTA region may be increasing. MDMA (3,4methylenedioxymethamphetamine, also known as ecstasy), diverted pharmaceuticals, and other dangerous drugs (ODDs) pose a relatively low threat to the HIDTA region.

^{3.} The NY/NJ HIDTA recently expanded to include Albany, Erie, Monroe, and Onondaga Counties in Upstate New York. These counties have been added to the HIDTA region because of their emerging role as key distribution centers for illicit drugs originating in New York City and because of the increasing presence of New York City-based drug trafficking organizations (DTOs) in the counties.

^{4.} According to the U.S. Census Bureau, the population of the New York metropolitan area is 45 percent Caucasian, 27 percent African American, 27 percent Hispanic, 10 percent Asian and Pacific Islander, and less than 1 percent Native American, Eskimo, or Aleut.

^{5.} Heroin that is repacked into retail quantities.

Drug Trafficking Organizations

Colombian DTOs control much of the smuggling and distribution of wholesale quantities of cocaine and SA heroin in the HIDTA region, and they typically contract with other DTOs to transport drugs from source and transit areas, such as Colombia, Mexico, and the Dominican Republic, to the area. In the interest of safeguarding their operations, most Colombian organizations have ceded transportation and lower-level distribution tasks to Dominican and Mexican DTOs who want to increase their share in the HIDTA region's drug trade. Colombian DTOs contract with these groups to transport large quantities of cocaine, heroin, and marijuana from the Southwest Border area to stash locations in the area. They also contract with Dominican DTOs to smuggle drugs, principally cocaine, from South America and the Caribbean into the Port of New York/New Jersey and heroin into the region's major airports by couriers on commercial aircraft. The couriers recruited come from a variety of ethnic and racial backgrounds. Couriers sometimes transport cocaine and heroin into Miami International Airport and drive the shipment to the HIDTA region in private and commercial vehicles.

Dominican organizations are major transporters and distributors of cocaine and SA heroin in the HIDTA region. They are based primarily in the Washington Heights section of Upper Manhattan but maintain most of their stash locations in outlying suburban communities in Westchester County and Long Island. Some Dominican DTOs travel to the Southwest Border area or the Caribbean to obtain large quantities of cocaine and heroin for transport to the HIDTA region, either under contract with Colombian DTOs or acting independently. Other Dominican organizations contract with Mexican DTOs to transport the drugs from the Southwest Border to the HIDTA region. Dominican DTOs also purchase large quantities of cocaine and heroin from Colombian organizations in the area, particularly in Queens. The Dominican DTOs

then supply lower-level distributors, predominantly Dominican groups, throughout the region and, increasingly, in the counties in Upstate New York. Some Dominican DTOs also deliver cocaine and heroin to their regular customers in these upstate areas. Dominican DTOs reportedly use security measures⁶ and violent means to protect their distribution activities.

Mexican DTOs are a major player in the HIDTA region's drug trade, particularly in the transportation and distribution of cocaine. Mexican DTOs have well-established overland transportation networks that allow them to be the primary transporters of cocaine to the HIDTA region. They also work with Colombian DTOs by transporting SA heroin and marijuana from Mexico and the Southwest Border area to the region, often receiving payment for services in drugs. Mexican DTOs are deeply involved in drug distribution within the HIDTA region as well, acting as wholesale distributors of cocaine, heroin, and marijuana that they distribute primarily to Dominican DTOs in the New York metropolitan area and Upstate New York. Some Mexican DTOs also transport marijuana from areas near the Southwest Border to New York City and northern New Jersey on behalf of Jamaican criminal organizations based in the HIDTA region.

Jamaican DTOs are the most prominent marijuana distributors in the New York City metropolitan area. They typically obtain Mexican marijuana from Mexican suppliers along the Southwest Border and transport the drugs to the HIDTA region themselves, although they sometimes contract with Mexican DTOs in Arizona to transport the marijuana for them. Jamaican DTOs and posses⁷ are the primary distributors of marijuana in sections of Manhattan and the Bronx, most of Queens (particularly the Jamaica section of southwestern Queens), northern Brooklyn (particularly Bedford, Bushwick, East Flatbush, East New York, and Williamsburg), and sections of northern New Jersey.

^{6.} Booby traps, electronic surveillance, etc.

^{7.} A Jamaican posse or crew is similar in structure to a street gang and engages in many of the same kinds of activities.

Ethnic Chinese DTOs, primarily Fukinese⁸ groups, are major smugglers of Southeast Asian (SEA) heroin into the region, using containerized cargo and couriers on commercial aircraft. They often hire Asian street gangs⁹ to distribute the heroin at the street level, sometimes selling the heroin on consignment rather than requiring payment upfront. Law enforcement reporting indicates that their operations are expanding in the HIDTA region.

Numerous street gangs are involved in the retail-level distribution of drugs, particularly crack, throughout the NY/NJ HIDTA region. Drug sales represent the primary source of income for most street gangs in the area, and most gangs sell more than one type of drug at a time. Street gangs active in the HIDTA region include Latin Kings, Ñeta, Bloods, Crips, and Mara Salvatrucha (MS 13). New York City-based gangs are expanding their presence into the HIDTA's upstate counties, as well as areas in New England, where profit margins are much larger. The involvement of street gangs in the retail-level distribution of cocaine and heroin in the New Jersey and Upstate New York areas of the HIDTA is rising, a development that has led to increased violence in those areas.

Other organizations have a lesser, but still significant, impact on the HIDTA region. Nigerian, West African, and Pakistani DTOs smuggle heroin into and through the NY/NJ HIDTA region. ¹⁰ Israeli DTOs transport large quantities of MDMA from Europe to the area and distribute the drug at the wholesale level. Italian Organized Crime (IOC) "families" distribute marijuana, heroin, cocaine, and MDMA in the HIDTA region and are involved in hydroponic marijuana production. Various Caribbean DTOs also smuggle cocaine and marijuana to the HIDTA region and generally distribute these drugs within their own ethnic communities.

Production

Illicit drug production is limited in the HIDTA region; however, some production of marijuana does occur, particularly in the Upstate New York counties. In addition, heroin is often repackaged into retail quantities in the New York metropolitan area, and powder cocaine is commonly converted to crack in the HIDTA region. African American, Dominican, and Jamaican distributors are the primary groups involved with converting powder cocaine to crack; it is often converted in small batches near the intended market because federal sentences for distribution or possession of crack are lengthier than those for powder cocaine. Some crack is transported from New York City to New Jersey. Of the crack sold in the HIDTA's Upstate New York counties, about half is converted from powder at the market site and half is transported from New York City as crack.

Most of the marijuana available in the HIDTA region is transported from the Southwest Border area and, to a lesser extent, Canada; however, some is produced locally. Large outdoor cannabis grow sites are uncommon, even in the rural areas of the HIDTA region's Upstate New York counties; however, residences throughout the HIDTA region are being used by marijuana producers to house indoor hydroponic operations. The number of these operations is increasing in the HIDTA region, particularly on Long Island. Dominican groups and Caucasian criminal organizations control hydroponic grow operations in Bayside and Nassau County. Low-level members of IOC families are also involved in producing hydroponic marijuana on Long Island. These groups are attracted to marijuana production because of the drug's tremendous profit margin and because penalties for possession and distribution are lower than those for many other drugs. In the past, grow operations were usually small, unsophisticated undertakings that produced limited quantities for personal use but now

^{8.} Fukinese refers to individuals from the Fujian province of southeastern China.

^{9.} Many of these gangs have realigned themselves with the Fukinese organizations and have adopted names such as "The Fuk Ching Flying Dragons," "The Fuk Ching Ghost Shadows," and "The Fuk Ching Green Dragons."

^{10.} West African DTOs working out of Thailand and Africa smuggle both Southeast Asian (SEA) and Southwest Asian (SWA) heroin. Pakistani DTOs smuggle only SWA heroin.

are typically larger and more sophisticated operations¹¹ that are designed to yield substantial quantities of high-potency marijuana for distribution.

Heroin is sometimes milled in the New York metropolitan area of the HIDTA region. Several heroin mills have been seized over the past few years. Recently, Drug Enforcement Administration (DEA) agents seized a heroin mill/stash house located in a residence in Westchester County. Agents seized 60,000 glassine bags (approximately 22 kg) of heroin, which had been concealed in traps in the stash house's floor, as well as cutting and packaging materials. All the recently seized mills were large operations hidden in homes located in residential areas. Heroin mills represent a potential vulnerability for heroin organizations because personnel with knowledge of trafficking operations are often at these sites, along with substantive evidence (ledgers, phone records, etc.) and substantial quantities of heroin.

In 2005 SA heroin purity in the area declined, continuing a downward trend first noted in 2003. Purity in both New York City (49.4%) and Newark (48.0%) fell behind that of Philadelphia (54.9%). During that time Philadelphia, New York City, and Newark ranked first, second, and third, respectively, in SA heroin purity. This was the first time in several years that Newark did not lead the nation in SA heroin purity.

Methamphetamine production is very low in the NY/NJ HIDTA region but may be increasing. The metropolitan nature of the New York City area makes the concealment of laboratories there very difficult; however, several have been seized over the past year in Brooklyn, the Bronx, Long Island, Manhattan, Queens, and Westchester County. These laboratories, like most of those seized in the rural areas of the HIDTA region, were small—only personal

use quantities could be produced in them. Most of the methamphetamine available in the region is produced in Mexico or on the West Coast and then transported to the HIDTA region for distribution.

Transportation

The HIDTA region's expansive transportation infrastructure is exploited by DTOs to transport drugs into and throughout the region. Six major interstate highways and 10 subsidiary interstates offer extensive transportation options from the New York metropolitan area to population centers throughout the country. Interstate 95 alone connects the HIDTA region directly to cities and towns along the East Coast, where over a quarter of the U.S. population resides; I-95 also connects the region to 10 major airports and 10 major seaports. Three international airports—John F. Kennedy, Newark Liberty, and LaGuardia—make the New York metropolitan area one of the world's busiest air transportation hubs, and various other international airports, including Buffalo Niagara International Airport and Albany International Airport, serve the region. Amtrak passenger rail service, commuter rail services, the largest subway system in the world, and an extensive network of commercial buses and taxis provide traffickers with additional transportation options to and within the area. The Port of New York/New Jersey is the largest container port complex on the East Coast of North America. Cargo is shipped to the port from more than 150 countries, and in 2006 the port handled more international cargo than ever before, over \$149 billion worth (see Figure 2 on page 7). Erie County in Upstate New York provides access to four major land POEs on the U.S.-Canada border. 13 DTOs routinely take advantage of these numerous transportation options to smuggle drugs into and throughout the HIDTA region. Law enforcement officials also report that DTOs are increasingly

^{11.} These operations are accessed through hidden doors, protected by complex security systems, and serviced by intricate ventilation and insulation systems.

^{12.} During that time period Houston, Texas, recorded a South American (SA) heroin purity level of 84.1 percent; however, this was not statistically significant because it was based on only two samples submitted to the Drug Enforcement Administration (DEA) Domestic Monitor Program (DMP). Philadelphia submitted 31 samples, Newark submitted 36 samples, and New York City submitted 61 samples to the 2005 DMP.

13. These ports of entry (POEs) are the Lewiston-Queenston Bridge (vehicular and commercial truck traffic), the Peace Bridge (vehicular and commercial truck traffic), the Whirlpool Bridge (vehicular traffic only), and the Rainbow Bridge (vehicular traffic only).

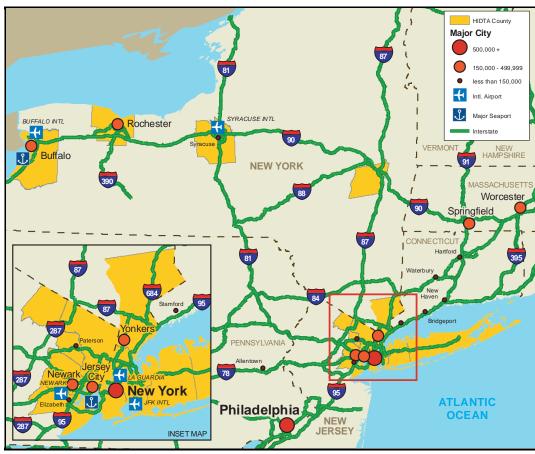


Figure 2. New York/New Jersey HIDTA transportation infrastructure.

using indirect routes such as state routes and back roads to transport drugs to the HIDTA region in an attempt to avoid law enforcement interdiction.

A wide variety of DTOs smuggle illicit drugs into the HIDTA region, using virtually every conceivable method. Colombian, Dominican, and Mexican DTOs are the major transporters of illicit drugs; Mexicans DTOs are taking on a more substantial role. Colombian, Dominican, and Mexican DTOs, sometimes contracting with each other, transport drugs overland from the Southwest. They also contract with Caribbean transportation groups to smuggle drugs from South America to Florida on maritime conveyances and onward to the HIDTA region by private and commercial vehicles and commercial aircraft. Colombian and Dominican DTOs arrange to have drugs shipped into the HIDTA's major airports, primarily by couriers on commercial aircraft, and into the Port of New York/ New Jersey, chiefly in containerized cargo. However, as Mexican organizations increase their

activity, more drug shipments are being transported to the region overland, mostly from areas at or near the Southwest Border, and fewer are being shipped from Florida. In addition, Mexican DTOs based in Atlanta, Georgia, are shipping increasing quantities of drugs from Atlanta to the NY/NJ HIDTA region. Mexican DTOs also are responsible for the influx of higher-purity crystal methamphetamine that is being transported to the area. In March 2007 the DEA seized 75 pounds of crystal methamphetamine in Newark, the largest crystal methamphetamine seizure in the state. The drugs had been transported overland from the Southwest Border area by members of a Mexican DTO and were to be distributed throughout the HIDTA and other areas in the Northeast.

Venezuela increasingly is being used as a transshipment area for cocaine and heroin transported by Colombian DTOs to the HIDTA region. Law enforcement pressure exerted in Colombia has caused some paramilitary groups involved in the drug trade to move their base of operations from Colombia to Venezuela. While some coca and opium poppy are grown in Venezuela, the country is mostly used as an operations base in which the final product is processed and shipped to drug markets in the United States. DTOs transport cocaine and heroin on commercial airlines from Venezuela, through other countries such as Ecuador and Mexico, to airports in the HIDTA region. These drugs are also transported to other areas of the United States, such as Texas, and transported overland to the HIDTA.

To lower the risk of having large quantities of drugs seized, many Colombian and Dominican DTOs store drugs in suburban areas outside New York City and bring smaller amounts into the city that they can distribute quickly. These stash locations are usually residences in suburban neighborhoods. Colombian DTOs are using such stash locations in the suburbs of Long Island and Westchester County and in areas with large Colombian populations, including Hudson and Passaic Counties in northern New Jersey. Many Dominican DTOs are also using stash locations in suburban neighborhoods in northern New Jersey.

Once shipments of cocaine and heroin arrive in the New York City metropolitan area, portions of the shipment are sometimes transported to the Upstate New York counties of the HIDTA region. Most of the cocaine and heroin abused in upstate markets is transported by couriers, often female, and upstate dealers who travel to New York City from Albany, Buffalo, Rochester, and Syracuse to bring back midlevel to wholesale quantities of the drugs for distribution. As upstate markets have increased in size, larger quantities of drugs are being transported to these counties, and New York City-based traffickers are more commonly traveling upstate to deliver drugs to their known customers. Distributors in Upstate New York also arrange to have cocaine and heroin transported directly from Atlanta; Chicago, Illinois; Florida; North Carolina; and Texas, bypassing sources in New York City

entirely. Law enforcement reports indicate that some cocaine traffickers in Rochester have increased their activities so significantly that they are bypassing sources of supply in New York City and dealing directly with Mexican sources. These methods of operation indicate that the drug markets in these upstate counties have grown significantly.

Canada-based DTOs arrange to transport illicit drugs, such as high-potency hydroponic marijuana and MDMA, from Canada to northern New York and then to major metropolitan areas. Major POEs, such as the Peace Bridge, 14 are used by traffickers to bring 1,000- to 2,000-pound quantities of Canadian hydroponic marijuana into New York; they often do so in tractor-trailers. Canada-based Vietnamese DTOs often hire East Indian, Pakistani, or Yemeni truck drivers to transport marijuana across the Northern Border, secreted among legitimate merchandise. Once in the United States, the drug is then further transported to points along the East Coast. Canadian hydroponic marijuana also is smuggled into Buffalo, Syracuse, and Albany in tractor-trailers and private vehicles. A large increase in quantities of hydroponic marijuana per shipment transported into the United States from Canada appears to be occurring. Previously, loads shipped through western New York POEs weighed several hundred pounds; now, most weigh multithousand pounds. This increase parallels a shift in marijuana transportation from private vehicles to larger commercial vehicles and may indicate that Canada-based traffickers are expanding to other U.S. markets. High-potency marijuana smuggled through western New York POEs is now shipped to markets throughout the East Coast and as far away as Houston, Texas. Marijuana is also transported by boat and private vehicle to New York from Canada through the St. Regis Mohawk (Akwesasne) Reservation. Asian DTOs based in Canada employ residents of the reservation to transport marijuana from Canada to Upstate New York and then on to other U.S. markets; some of these smugglers travel as far south as Virginia. Albany and, even more so, Syracuse have become major transshipment points for

^{14.} The Peace Bridge spans the Niagara River and connects Buffalo with Fort Erie, Ontario.

Canadian hydroponic marijuana smuggled through the Akwesasne Reservation. Dominican traffickers from New York City drive to Syracuse and Albany to meet smugglers from the reservation, purchase the marijuana, and then transport it to New York City for distribution there.

Transportation of MDMA from Canada to Upstate New York has increased, according to DEA. MDMA trafficking in Upstate New York typically consists of independent dealers transporting small quantities of the drug from New York City to upstate markets; however, as Canada's importance as an MDMA source of supply to the United States has increased, there has been a significant rise in MDMA transported into the Upstate New York area. Most of this MDMA is smuggled in vehicles and transits the area; the drug is most commonly transported through the upstate counties and then on to cities such as New York City and Boston, Massachusetts, where demand is greater.

Distribution

DTOs, criminal groups, and independent distributors of various nationalities and ethnicities/ races (see Table 1 in Appendix C) sell illicit drugs at the wholesale, midlevel, and retail levels in the HIDTA region. Colombian organizations are involved in the wholesale distribution of most illicit drugs. Dominican DTOs distribute wholesale quantities of cocaine and SA heroin in the region, sometimes on behalf of Colombian DTOs and, other times, working independently. Mexican DTOs are involved in the wholesale distribution of Mexican marijuana, cocaine, and SA heroin; their involvement in drug distribution within the region is increasing. Israeli organizations are the primary wholesale distributors of MDMA in the region; however, Dominican DTOs have increased their role and are now heavily involved. Jamaican DTOs dominate distribution of wholesale quantities of Mexican and Jamaican marijuana in the region. No particular ethnic group controls the retail trade of

any drug in the HIDTA region. The ethnic/racial makeup of the neighborhood in which drugs are sold generally determines which organizations have control in that area.

In the Upstate New York counties of the HIDTA region, illicit drugs are distributed at the wholesale level by Hispanic, Dominican, and African American DTOs and at the midlevel and retail level by those DTOs as well as by street gangs and various independent dealers; gang members are the primary retail-level distributors of cocaine and heroin in the upstate counties. Some DTOs from New York City are expanding their operations into the upstate counties because of the increased profit margins and new consumer bases available there.15 The profit margin for heroin is particularly high,¹⁶ prompting some DTOs to increase their upstate heroin activities. As the upstate drug trade has increased, the major population centers (Albany, Buffalo, Rochester, and Syracuse) of the upstate counties have became distribution hubs for the surrounding communities.

Retail distributors use cell phones to facilitate drug sales in the HIDTA region. Distributors are using pagers far less often than in the past and, instead, are frequently negotiating transactions and prearranging meetings with customers by cell phone. Traffickers prefer to conduct these business conversations on phones with point-to-point capabilities because these communications are much more difficult for law enforcement to intercept. Distributors also use the cell phones' text feature to communicate and arrange meetings. To further reduce the possibility of having calls monitored, they typically use cell phones for a limited time before switching to a new phone with a new number.

DTOs in the HIDTA region are distributing drugs through Internet web sites. Law enforcement reporting indicates that distributors are selling

^{15.} This expansion may take the form of a DTO member driving up to the city for a few days, setting up a drug distribution operation in a hotel room, and then driving back to New York City.

^{16.} According to DEA, in the first quarter of fiscal year (FY) 2007, an ounce of heroin sold for \$1,300 to \$2,900 in New York City, \$2,800 to \$5,000 in eastern Upstate New York, and \$2,800 to \$5,500 in western New York.

methamphetamine in the area on Internet web sites, using chat rooms and Internet bulletin boards to facilitate distribution of the drug. Further, distributors and abusers are increasingly obtaining prescription opiates and other pharmaceuticals from Internet pharmacies, including those operated on Canadian web sites. Internet pharmacies are becoming increasingly popular among distributors and abusers of opiates because local doctors, recognizing the high abuse potential of prescription opiates, have become less willing to prescribe these drugs. Some distributors also use web sites to advertise their services or electronic messaging to contact customers and arrange drug transactions.

Drug-Related Crime

Most of the drug-related crime and violence that occurs in the HIDTA region is committed by street gangs that dominate the retail-level distribution of drugs in many areas of the HIDTA. Some of these gangs also are trading illicit drugs for firearms. Most violence is directed at other gangs over matters of turf and distribution areas or occurs within gangs about matters such as theft or jealousy over promotions. The majority of the street gangs operating in the area are loosely knit groups organized chiefly to distribute illicit drugs; however, highly structured, nationally affiliated street gangs such as Latin Kings, MS 13, and Bloods operate in the HIDTA region as well. Most street gangs in the area are violent, operate in a defined area or turf, and are ethnically homogeneous, reflecting the ethnic population in their area of operation.

Gang-related crime is increasing in the New York City metropolitan area. According to New York Police Department (NYPD) arrest statistics, gang-related¹⁷ incidents increased 47.3 percent from 2005 through 2006, and gang-motivated¹⁸ incidents increased 44.4 percent. Further, gangs in the HIDTA region are attracting younger members and absorbing smaller gangs. Latin Kings in New

York City has recently been recruiting from the city's youth, forming new chapters, and increasing its presence in the New York City drug trade. Latin Kings in northern New Jersey has also increased its activity. Bloods is increasing its presence in the drug trade in Newark, taking over smaller gang sets, consolidating its power, spreading into suburban areas, and engaging in violent clashes with other gangs. In 2006 Regional Fugitive Task Force¹⁹ (see Appendix A) gang-affiliated arrests increased to 430, up from 246 in 2005.

Nassau and Suffolk Counties on Long Island have experienced an increase in gang activity and associated violence over the past several years. Gang cliques in Nassau County are located primarily in the towns of Farmingdale, Freeport, Hempstead, New Cassel, Roosevelt, and Westbury, while gang cliques in Suffolk County are located primarily in Brentwood, Copiague, Huntington, and Islip. MS 13 is the most violent and fastest-growing gang on Long Island; violent incidents involving this gang are on the rise. However, as a result of aggressive law enforcement operations on Long Island, some gangs are moving to communities in Westchester County, such as Mount Kisco and Bedford.

Gang activity in the upstate areas of the HIDTA is increasing as well, partially because of gang expansion from New York City. A growing trend among New York City gangs is to move drug operations upstate where they can realize higher profit margins from drug sales with less law enforcement scrutiny. For instance, the expansion of Bloods into areas of Upstate New York may be related to increased trafficking of Canadian hydroponic marijuana. Gang members in western New York routinely cross the U.S.—Canada border to purchase hydroponic marijuana and are involved in numerous crimes on the Canadian side of the border. Gang expansion has also caused an increase in violent crime in the upstate HIDTA counties. Much of this

^{17.} The New York Police Department (NYPD) defines a gang-related incident as any incident of unlawful conduct by a gang member or suspected gang member.

^{18.} The NYPD defines a gang-motivated incident as any gang-related incident that is done primarily to benefit the interests of the gang; as part of an initiation, membership rite, or act of allegiance or support for a gang; or as a result of a conflict or fight between gang members.

^{19.} The Regional Fugitive Task Force mission is to apprehend dangerous, violent fugitives in the New Jersey/New York metropolitan area.

violence occurs between gangs as members steal from each other and retaliate with violence. Buffalo, in particular, posted a high number (73) of homicides in 2006, many of which were gang-related.

Abuse

Nearly all illicit drugs are abused to some extent in the HIDTA region; heroin, cocaine, and marijuana are abused at particularly high levels. Heroin-related treatment admissions in the region exceed those of any other drug. Heroin has attracted a new and younger consumer base, and abuse has spread from lower-income areas to some middle- and upper-income neighborhoods in New York City. The vast majority of heroin available in the HIDTA region is South American. Heroin purity has decreased significantly over the past few years;²⁰ however, purity remains at levels that enable abusers to snort the drug rather than inject it. Additionally, in 2006 there were approximately 57 fentanyl-related overdose deaths in the New York HIDTA counties; some of these were caused by heroin/fentanyl combinations.²¹

Cocaine is abused at particularly high levels in the New York counties of the HIDTA, and the drug is readily available in all major population centers in the state. Cocaine abuse has increased, notably among nightclub patrons in western New York. Abuse of marijuana, particularly high-potency Canadian marijuana, is high and increasing in the upstate counties of the HIDTA. Abuse is most common among young people and college students in these areas. Crystal methamphetamine abuse is popular among nightclub patrons in New York City. Law enforcement and public health officials are monitoring this situation because this group of individuals has long been on the cutting edge of drug trends that later spread to the general population. Law enforcement and public health authorities also are monitoring PCP (phencyclidine) abuse in Hudson and Essex Counties because of 20 PCP- related deaths that occurred in the areas during 2006; these areas generally do not report PCP-related deaths.

Illicit Finance

The NY/NJ HIDTA region's immense financial infrastructure and expansive level of economic activity provide an environment ideal for the laundering of illicit funds; DTOs in the United States and abroad exploit this vast infrastructure to launder money. New York City is one of the world's principal financial centers and the economic capital of the United States, as well as a central market for the international jewelry and precious metals industries. The El Dorado Task Force (see Appendix A) estimates that each year between \$4 billion and \$8 billion in illicit drug proceeds are laundered by drug traffickers using financial institutions in the New York metropolitan area.

Traffickers use the many international banks located in the HIDTA region to facilitate money laundering activity through worldwide correspondent banking. A bank in the United States cannot transmit a payment directly to a foreign bank unless the U.S. bank has a correspondent account or an overseas branch in that country. Many of the largest international banks are located in the HIDTA region and serve as correspondents for thousands of other banks worldwide. Traffickers exploit this situation by placing funds in U.S. banks and banks located in countries throughout the world, usually by "smurfing,"22 and then amassing the funds in U.S. accounts of the international banks in New York City. This method allows traffickers to leave a seemingly legitimate paper trail, minimizing suspicion. Moreover, funds sent through several correspondent accounts are more difficult for investigators to track because bank secrecy laws in place in many foreign countries further shield traffickers from law enforcement

^{20.} According to DEA DMP Program data, SA heroin purity in New York City decreased from 53.5 percent in 2003 to 49.4 percent in 2005; SA heroin purity in Newark decreased from 61.3 percent in 2003 to 48.0 percent in 2005.

^{21.} It is impossible to state the exact number of deaths related to heroin/fentanyl combinations in the HIDTA region because medical examiners do not always test for fentanyl.

^{22.} Smurfing is the act of depositing amounts just below the threshold required for banks to report the transaction as suspicious.

scrutiny. The Association of International Bank Auditors in New York reports that at least 100 foreign banks are operating in New York City. This number does not include the U.S. banks with correspondent accounts or overseas branches.

Other methods commonly used by traffickers to move and launder illicit funds through the HIDTA region include electronic wire transfers, smurfing, the Black Market Peso Exchange (BMPE), and bulk cash smuggling. Mexican DTOs in particular prefer to move funds through bulk cash smuggling. Drug traffickers in the HIDTA are increasingly laundering funds through money orders as well.

Money launderers are also exploiting privately owned automated teller machines (ATMs) for illicit purposes in the NY/NJ HIDTA region. Privately owned ATMs are becoming more popular in the area and are appearing in bars, restaurants, delis, gas stations, and other businesses throughout the HIDTA region. Money launderers can purchase one or more machines and load them with drug funds. As cardholders use these machines to make withdrawals, the electronic transaction debits the cardholders' accounts and credits the ATM owner's bank account. At the end of each month, the owner has a genuine bank statement showing money being electronically deposited into his account from a legitimate financial institution. The recent proliferation of privately owned ATMs and the lack of regulatory measures used to monitor them makes these machines extremely vulnerable to misuse by criminals. Money launderers can acquire and operate their own network of ATMs and assert total control over the withdrawal process with little or no actual movement of cash.

Stored value cards are increasingly being used by traffickers to launder funds in the HIDTA region. Resembling traditional credit or debit cards, stored value cards can be used by traffickers to access both global debit and ATM networks. Funds can be prepaid by one person in any denomination and withdrawn by another individual at ATMs anywhere in the world. These cards provide a convenient way to launder money because they

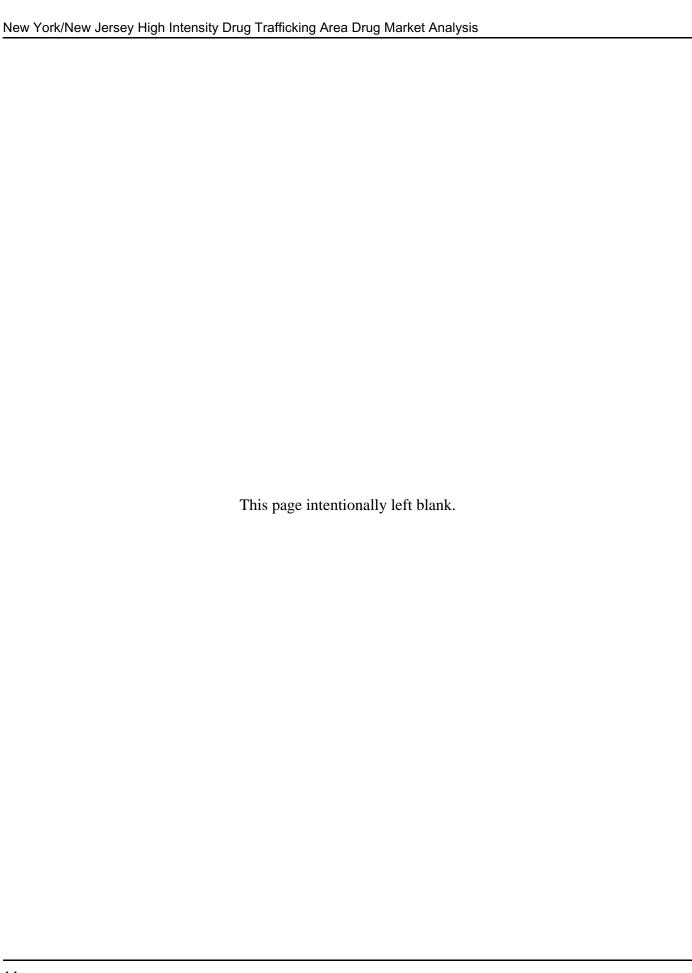
are an easily transportable and virtually anonymous way to store and access cash. Moreover, stored value card programs often accept applications without face-to-face verification of cardholder identity, allowing money launderers to operate with relative anonymity.

Outlook

The influence of Mexican DTOs on drug distribution in the NY/NJ HIDTA region will very likely increase in the coming year. Over the past several years, these DTOs have been expanding and strengthening their networks throughout the region, transporting a larger percentage of the cocaine and heroin available that is brought into the area and increasing their distribution activities. Colombian DTOs have relied heavily upon the Mexican DTOs to carry out transportation and distribution tasks. Mexican DTOs are well-positioned to provide increasing amounts of drugs to the HIDTA region because they have established highly efficient and reliable networks nationwide that enable them to obtain drugs and provide them to distributors in the region. As their influence increases, the HIDTA region may experience an increase in high-purity, Mexican methamphetamine availability and a larger volume of drugs transported overland.

The involvement of New York City-based DTOs and gangs in drug markets in the upstate HIDTA counties is likely to increase. These groups perceive law enforcement pressure to be less intense in upstate areas, and the increased profit margins and new consumer bases are attractive to groups wishing to expand their markets. They can be expected to increase deliveries to regular customers in the upstate areas and send more organization members upstate to distribute drugs on a temporary basis or take up permanent residence there. As a result, upstate population centers will grow as drug markets and will increasingly serve as distribution centers for the smaller cities and suburban areas around them.

Heroin abuse may increase in the NY/NJ HIDTA in the coming year. Heroin abuse has spread in recent years from traditional user groups to new bases such as younger abusers and abusers from middle- and upper-income areas. Many potential abusers in these new populations have yet to be exposed to the drug. Additionally, upstate markets, in which the profit margin for heroin is especially large and new populations of potential abusers exist, will most likely be the target of traffickers who want to increase their customer base.



Appendix A. New York/New Jersey HIDTA Enforcement Task Forces

The **El Dorado Money Laundering Task Force** is a multiagency task force whose mission is to disrupt, dismantle, or render ineffective organizations involved in the laundering of the proceeds of illicit drug trafficking and in other financial crimes in the New York metropolitan area. This mission is accomplished by targeting the primary avenues used by drug traffickers to launder drug profits: money services, physical transportation, merchandising, banking and brokerages, and bulk cash. The task force is led by U.S. Immigration and Customs Enforcement (ICE) and consists of 176 representatives from various federal, state, and local law enforcement agencies. The El Dorado Task Force is also part of the High Intensity Financial Crimes Area (HIFCA) Program for the New York metropolitan area.

In calendar year (CY) 2006, the task force dismantled 2 and disrupted 35 money laundering organizations and seized more than \$24 million.

The **Regional Fugitive Task Force** is led by the U.S. Marshals Service and comprises more than 130 federal, state, county, and local law enforcement officers from 50 law enforcement agencies. The task force's mission is to apprehend dangerous, violent fugitives in the New Jersey/New York metropolitan area.

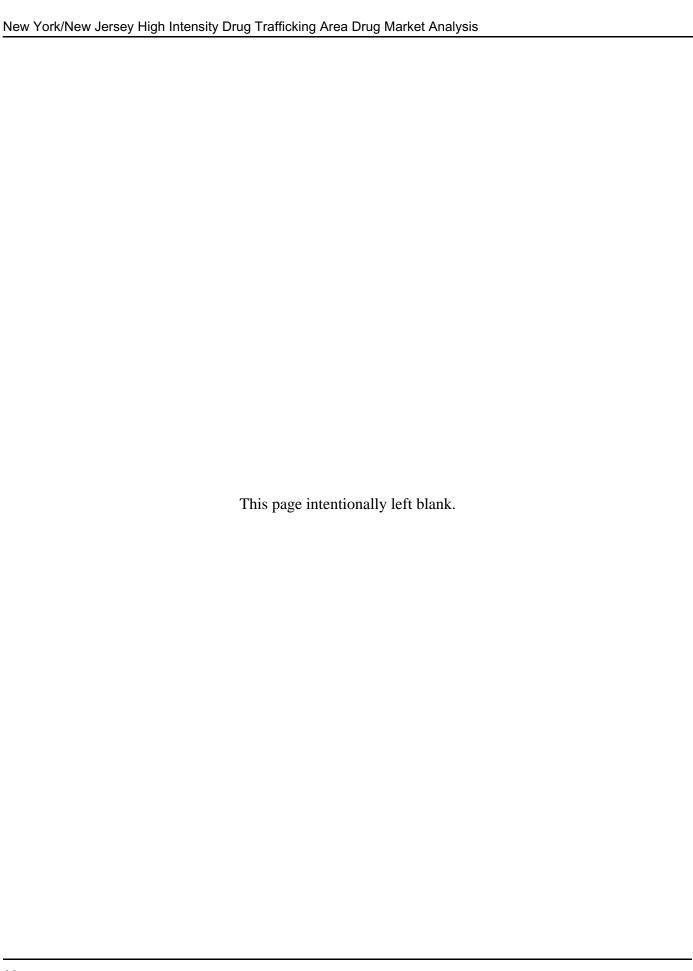
In CY2006 the task force arrested 4,232 fugitives, of whom 1,259 were prior felony offenders; 1,115 were charged with drug felonies, and 474 were affiliated with gangs.

The **New Jersey Drug Trafficking Organization Task Force** draws together investigators from DEA and state, county, and local law enforcement agencies to disrupt or dismantle major DTOs in New Jersey.

In CY2006 the task force dismantled 3 and disrupted 14 DTOs and seized over \$7 million.

The New York Organized Crime Drug Enforcement Task Force (OCDETF) Strike Force comprises investigators from DEA, Federal Bureau of Investigation (FBI), ICE, Internal Revenue Service (IRS), U.S. Marshals Service, NYPD, and New York State Police. Its mission is to disrupt and dismantle major DTOs that have been designated by the U.S. Department of Justice as Consolidated Priority Organization Targets (CPOTs), Regional Priority Organization Targets (RPOTs), and affiliates operating within the New York metropolitan area.

In CY2006 the task force dismantled 4 and disrupted 6 DTOs and seized over \$6 million.



Appendix B. Profiles of HIDTA Counties in Upstate New York

Albany County

Drug Threat

Cocaine, particularly crack, poses the greatest threat to Albany County and the city of Albany. Heroin and marijuana, particularly hydroponic marijuana from Canada, also pose a serious threat to the area.

Sources of Supply and Transportation

Powder cocaine dealers in Albany County are usually young Caucasian males and African American males. They often use cell phones or pagers to place an order with Dominican males based in the Washington Heights section of Manhattan. The Albany dealers then travel to Washington Heights in privately owned vehicles, purchase multiounce quantities of cocaine, and transport the drug to Albany County for retail distribution. The Albany dealers make these trips on a weekly basis and usually purchase cocaine from multiple sources in Washington Heights. The prices are generally similar—they often obtain the drug from whoever has it available. The dealers also transport cocaine to the area from New York City by bus. Some of the Washington Heights-based Dominican sources travel in privately owned vehicles to Albany to deliver multiounce to kilogram quantities of the product to their regular customers.

Crack dealers in Albany County are usually African American males ranging in age from 14 to 30 years. They obtain multiounce quantities of crack from Dominican DTOs in Washington Heights and transport the drug to Albany for retail distribution. They also purchase powder cocaine and process it into crack. These dealers usually travel in privately owned vehicles to Washington Heights on a weekly basis; however, they also employ couriers, often female, to transport the product.

Heroin dealers in Albany County are usually Hispanic, both males and females, ranging in age from 20 to 50 years. A small contingent of young African American males also distributes heroin in the area. Dealers usually travel in privately owned vehicles to Washington Heights, where they purchase the drug from Dominican DTOs and then transport 300 to 400 bags of heroin to the Albany County area for retail distribution. Heroin dealers also transport the drug to Albany on commercial buses and trains.

Albany-based midlevel hydroponic marijuana dealers often travel to the St. Regis Mohawk Reservation on the U.S.—Canada border, purchase marijuana from Native American smugglers who reside on the reservation, and then transport the drug to the Albany area. They then meet retailers in locations such as shopping mall parking lots and distribute the drug there.

Secondary Markets

The city of Albany is a distribution center for crack cocaine in Upstate New York. The city also is a source of supply for powder cocaine, crack, and heroin to smaller cities and towns in the surrounding areas as well as Vermont and Massachusetts. Dealers and abusers from Clifton Park, Colonie, Lake George, Plattsburgh, Saratoga Springs, Schenectady, Syracuse, Troy, and other surrounding towns travel to Albany to obtain drugs for further distribution or personal consumption. Some Albany dealers also deliver cocaine and crack to their regular customers in these secondary markets. These deals typically take place at prearranged meeting locations in residences or parking lots.

Erie County (Buffalo)

Drug Threat

Cocaine, particularly crack, poses the greatest threat to Erie County and the city of Buffalo. Marijuana, particularly hydroponic marijuana from Canada, poses a serious threat to the area because Buffalo has become a major transshipment point for Canadian marijuana smuggled into the United States. Heroin poses an increasing threat to the area.

Sources of Supply and Transportation

The distribution of powder cocaine, crack, and heroin is controlled by Hispanic traffickers, particularly Dominicans, on the west side of Buffalo and by African American traffickers on the east side. The dealers are usually male and range in age from 17 to 50.

Powder cocaine dealers usually travel twice a month in private vehicles to New York City and, to a lesser extent, Atlanta; Detroit, Michigan; and various locations in Florida to purchase cocaine from their sources of supply. They typically transport larger quantities (multikilogram quantities) than quantities transported by dealers in Albany or Syracuse because Buffalo is a greater distance from New York City. Some local cocaine dealers also receive shipments directly from areas near the Southwest Border.

Crack dealers transport powder cocaine to Buffalo, where they convert the powder cocaine to crack. Most of the crack processed in Buffalo remains in the area.

Local heroin traffickers travel to New York City in privately owned vehicles to purchase heroin, both prepackaged and in bulk. Many of these dealers use females as couriers to transport the drug. They also transport kilogram quantities of heroin to Buffalo in "trapped vehicles." Most of the traffickers purchase heroin in wholesale or midlevel quantities and package it for retail distribution upon their return to Buffalo.

Secondary Markets

The city of Buffalo supplies many secondary markets in Erie County and other surrounding areas. Dealers and abusers from Amherst, Cheektowaga, Jamestown, Niagara Falls, Olean, Tonawanda, and West Seneca drive to Buffalo to purchase powder cocaine, crack, heroin, and marijuana for personal use and further distribution. Additionally, Buffalo crack dealers deliver the product to regular customers in suburban and rural areas and to other cities such as Rochester; some deliveries have been made as far away as Batavia and Springville.

Buffalo is a major transshipment point for marijuana entering the United States and cocaine entering Canada, and the Niagara Frontier Region is the primary transit area for cocaine entering eastern Canada, according to DEA. Western New York POEs are increasingly being used for the transshipment of marijuana into the United States; a large portion of the marijuana seized in Buffalo is destined for locations outside western New York. There has also been a large increase in the quantity of hydroponic marijuana shipped to the United States from Canada. Previously, loads shipped through western New York POEs weighed several hundred pounds; now most weigh several thousand pounds.

^{23.} Trapped vehicles are vehicles equipped with hidden compartments that are used for smuggling drugs, drug proceeds, and other illicit materials.

Monroe County (Rochester)

Drug Threat

Powder cocaine poses the most serious threat to Monroe County and the city of Rochester. Crack cocaine, heroin, and marijuana also pose significant threats to the city.

Sources of Supply and Transportation

Rochester-based powder cocaine dealers make frequent trips on Interstates 90 and 87 to New York City and transport 2 to 6 kilograms of cocaine to Rochester. They usually purchase the cocaine in Washington Heights and southern Brooklyn. Some dealers also travel to Houston and Atlanta and transport 5 to 15 kilograms of cocaine to Rochester. The dealers, usually young Dominican males, use sophisticated traps in privately owned vehicles to conceal the cocaine. Upon returning to Rochester, they distribute the cocaine to Dominican and African American midlevel and retail dealers.

Most crack cocaine dealers in Rochester are young African American males. They travel to New York City in privately owned vehicles, buses, and trains and transport multikilogram quantities of powder cocaine to Rochester for conversion to crack. Some of the Rochester dealers also have direct connections with Mexican DTOs and order cocaine directly from them. Further, some New York City-based sources of supply deliver cocaine directly to Rochester dealers, and, in some cases, they wait for payment until the drugs are sold.

Local heroin dealers, usually Dominicans, travel in privately owned vehicles to New York City or Detroit, purchase multiounce quantities of the drug, and transport it to Rochester for local distribution.

Secondary Markets

Rochester serves as a distribution center for powder and crack cocaine and heroin to cities, towns, and counties within a 40-mile radius of the city, including the towns of Corning and Elmira as well as Livingston, Ontario, Seneca, Wayne, and Yates Counties.

Onondaga County (Syracuse)

Drug Threat

Cocaine, particularly crack, poses the most serious threat to Onondaga County and the city of Syracuse. Marijuana, particularly Canadian hydroponic marijuana, also poses a significant threat. Heroin poses an increasing threat to Syracuse, particularly in the city's affluent areas.

Sources of Supply and Transportation

Local dealers make frequent trips from Syracuse to Washington Heights in private vehicles, buses, and trains and purchase multiounce quantities of cocaine or smaller quantities of heroin. Dealers also commonly recruit couriers, often female, to transport cocaine and heroin to Syracuse. Most of the crack available in the Syracuse area is transported as powder cocaine and converted locally. Heroin is also transported to Syracuse from Rochester. The drug is then cut and repackaged for retail distribution in the city and surrounding areas.

Secondary Markets

Syracuse supplies secondary markets in an approximate radius of 60 miles from the city, including Binghamton, Fort Drum, Oswego, Utica, and Watertown.

Appendix C. Drug Distributors in the New York/New Jersey HIDTA

Table 1. Illicit Drugs, Drug Distributors, and Levels of Distribution in the New York/New Jersey HIDTA

Cocaine Distributors		
Wholesale	Midlevel	Retail
African American DTOs	African American DTOs, CGs	African American CGs, INDs
Colombian DTOs	Caucasian DTOs, CGs	Caucasian CGs, INDs
Dominican DTOs	Colombian DTOs, CGs	Dominican CGs, INDs
Mexican DTOs	Dominican DTOs, CGs	Jamaican CGs, INDs
Puerto Rican DTOs	Jamaican DTOs, CGs	Mexican CGs, INDs
	Mexican DTOs, CGs	Puerto Rican CGs, INDs
	Puerto Rican DTOs, CGs	Street gangs
	Street gangs	
	Heroin Distributors	
Wholesale	Midlevel	Retail
Asian DTOs	Asian DTOs, CGs	African American CGs, INDs
Colombian DTOs	Colombian CGs	Asian CGs, INDs
Dominican DTOs	Dominican DTOs, CGs	Dominican CGs, INDs
Mexican DTOs	Mexican DTOs, CGs	Puerto Rican CGs, INDs
Pakistani DTOs	Pakistani DTOs, CGs	Street gangs
West African Nigerian DTOs	West African Nigerian DTOs, CGs	West African Nigerian CGs, INDs
	Marijuana Distributors	
		T
Wholesale	Midlevel	Retail
Caucasian DTOs	-	Retail African American CGs, INDs
	Midlevel Caucasian CGs, INDs Colombian CGs	African American CGs, INDs Caucasian CGs, INDs
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Table 1. Illicit Drugs, Drug Distributors, and Levels of Distribution in the New York/New Jersey HIDTA (Continued)

Diverted Pharmaceuticals Distributors			
Wholesale	Midlevel	Retail	
NA	Caucasian CGs, INDs	Caucasian CGs, INDs	

NA-not applicable

DTOs-drug trafficking organizations

CGs-criminal groups

INDs-independent dealers

Sources

Local, State, and Regional

Newark Police Department

New Jersey Department of Human Services

Division of Addiction Services

New York City Police Department

New York High Intensity Financial Crimes Area

New York State Office of Alcohol and Substance Abuse Services

New York State Police Department

Port Authority of New York/New Jersey

Federal

Executive Office of the President

Office of National Drug Control Policy

High Intensity Drug Trafficking Area

New York/New Jersey

HIDTA Enforcement Task Force

U.S. Department of Commerce

U.S. Census Bureau

U.S. Department of Justice

Drug Enforcement Administration

New Jersey Field Division

New York Field Division

Federal Bureau of Investigation

U.S. Attorney's Offices

Eastern District of New York

New Jersey

Northern District of New York

Southern District of New York

Western District of New York

U.S. Department of the Treasury

Financial Crimes Enforcement Network

U.S. Senate

The Permanent Subcommittee on Investigations

Other

The Association of International Bank Auditors





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