

REPORT OF INVESTIGATION
2002-0019



Office of Inspector General

United States Department of the Treasury



INVESTIGATIVE RECORD REVIEW/COPY LOG

<i>Case Number:</i> 2002-0019	<i>Case Title:</i> Jaysen Ahern Director of Field Operations, United States Customs Service, San Diego, California.
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REPORT OF INVESTIGATION



FEB 22 2002

DATE OF REPORT:	
REPORT STATUS:	Final
CASE NUMBER:	2002-0019
CASE TITLE:	Jayson Ahern Director of Field Operations United States Customs Service San Diego, California
ALLEGATION(s):	5 C.F.R. Part 2635.101 (b)(6) Knowingly make unauthorized commitments purporting to bind the United States Government. U.S. Customs Service, Table of Offenses and Penalties, I-3.

SYNOPSIS

On October 23, 2001, the Miami Field Office, Department of the Treasury, Office of Inspector General (OIG), received a complaint from the Office of Special Counsel (OSC). The complaint stated that Eileen DeSanto, Senior Inspector, United States Customs Service (USCS), Miami International Airport (MIA), Miami, Florida, alleged that inspectors on the USCS Outbound Inspection Team were required to provide American Airlines with a three-hour advance notice, and several other airlines with a one-hour advance notice. DeSanto alleged that this advance notice compromised Customs' enforcement posture and contributed to a major decline in outbound money smuggling seizures. DeSanto also alleged that USCS management ignored "Be On the Look Out" (BOLO) reports regarding illegal cargo, specifically that management was no longer forwarding the reports to the team leaders.

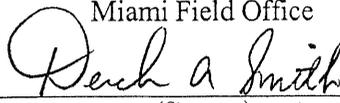
The investigation determined that although USCS officials admitted giving advance notification to the airlines, when interviewed by the OIG, except for American Airlines, airline representatives denied that advance notification was ever given for "routine outbound inspections." However, the airline representatives did acknowledge receiving advance notification when there was a specific "lookout" for a passenger or cargo. Additionally, the

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Assistant Commissioner
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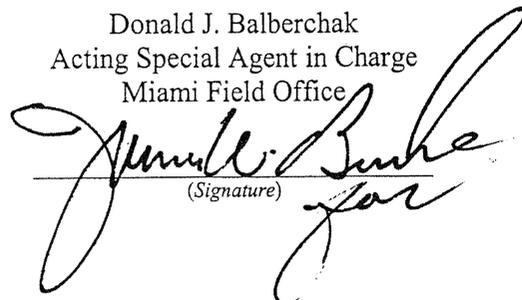
Reported By:

Howard G. Waters
Special Agent
Miami Field Office


(Signature) *Jan*

Approved By:

Donald J. Balberchak
Acting Special Agent in Charge
Miami Field Office


(Signature) *Jan*

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investigation determined that monetary seizures by the USCS MIA, Outbound Inspection Teams dropped significantly from 9.7^{million} dollars in FY 2000, to 4.1 million dollars in FY 2001, after the advance notification policy was instituted. Current Chief Inspector Chester William Olejasz, Outbound Inspections, USCS, Miami, noted that this drop could also be attributed to the emphasis by the USCS on "risk management," and less on "enforcement." He opined that smugglers could have chosen other smaller ports of entry as well.

The investigation further revealed that USCS directives fail to address advance notification of Outbound Inspections. Regarding the BOLO reports, the investigation revealed the reports were being properly documented and placed in the BOLO log. In addition, the vast majority of the reports contained the required information, including an indication as to the disposition of the BOLO. There was no evidence to indicate the BOLOs were being "ignored."

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DETAILS

The Treasury Office of Inspector General (OIG), initiated an investigation on October 23, 2001, after the Miami Field Office, Treasury, OIG, received a complaint from the Office of Special Counsel (OSC) through the Office of the Secretary of the Treasury. The complaint stated that Eileen DeSanto, Senior Inspector, United States Customs Service (USCS), Miami International Airport (MIA), Miami, Florida, alleged that Inspectors on the USCS Outbound Inspection Team were required to provide American Airlines with a three-hour advance notice, and several other airlines with a one-hour advance notice. DeSanto also alleged that this advance notice compromised Customs' enforcement posture and contributed to a major decline in outbound money smuggling seizures. In addition, DeSanto alleged that USCS management ignored BOLO reports regarding illegal cargo, specifically that management was no longer forwarding the reports to the team leaders. (Exhibit 1)

Allegation #1: It was alleged that Jayson Ahern provided American Airlines, and several other airlines with advance notification prior to conducting outbound inspections, which compromised USCS's enforcement posture and significantly decreased the number of outbound money smuggling seizures.

On October 25, 2001, the OIG interviewed Eileen DeSanto, Senior Inspector, GS-11, Outbound Inspections, United States Customs Service (USCS), Miami, Florida. DeSanto stated that between 1997 and 1999, the USCS Outbound Inspection Teams were required to provide a three-hour advance notice to American Airlines and a one-hour notice to other airlines. DeSanto said that former Port Director Jayson Ahern and Chief Inspector Nathaniel Norwood put this policy into place. DeSanto stated that inspectors were required to call the airlines and give advance notice prior to an outbound inspection. (Exhibit 2)

On October 25, 2001, the OIG interviewed Chester William Olejasz, Chief Inspector, GS-13, Outbound Inspections, United States Customs Service (USCS), Miami, Florida. Olejasz serves as the Chief Inspector for Outbound Inspections at Miami International Airport and supervises and coordinates the Outbound Inspection process. Olejasz said that, currently, USCS does not give a three-hour notice to American or any other airline. Olejasz stated that the current policy is to give no notice to any airline regarding an inspection. Olejasz said that USCS Outbound Inspectors sometimes do arrive approximately forty-five minutes to one hour prior to departure to inspect passengers and baggage but no advance warning is given. Olejasz admitted that the previous Port Director (Ahern) and Chief Inspector of Outbound Inspections, Michael Norwood, provided American Airlines advance notification.

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Olejasz admitted that the outbound seizures at MIA have dropped significantly this past year. Olejasz said that in Fiscal Year (FY) 2000, USCS inspectors seized over ten million dollars in undeclared outbound currency. In FY 2001, the amount of undeclared currency dropped to four million dollars. Olejasz related that there were several other possible reasons that the outbound seizures dropped. Olejasz stated that USCS had become more focused on Risk Management and less on enforcement. Additionally, USCS requires all inspectors to submit a data collection form on every inspection that they conduct. Olejasz opined that Inspectors are conducting fewer inspections because of the paperwork involved and that subsequently outbound inspections are down approximately twenty percent. (Exhibit 3)

On November 19, 2001, the OIG interviewed Nathaniel Michael Norwood, Chief Inspector, Passenger Processing Unit, USCS, Miami, Florida. Norwood stated that during his tenure at Outbound Assignments, he and Port Director Jayson Ahern were under pressure from local management and USCS Headquarters to work with the trade community and the airlines. Norwood stated that then Customs Management Center (CMC) Director D. Lynn Gordon insisted that the USCS airport staff accommodate the airlines with passenger and cargo processing as much as possible.

Norwood said that certain airlines had numerous delays because of outbound exams, specifically, American Airlines (AA), Aces and Avianca Airlines. Norwood stated that these airlines complained about the delays and as a result, a meeting between American Airlines officials and MIA USCS managers was held. Norwood said that the meeting was attended by Rick Arner, Manager, International Operations, American Airlines, Miami International Airport, Miami, Florida, Ahern, and himself, to work out some of the delay problems. Norwood stated that Arner suggested that the USCS give American Airlines advance notification prior to an outbound inspection taking place so that they, AA, could provide additional personnel to assist with unloading and reloading baggage. Norwood admitted that he and Ahern agreed to provide American Airlines and other airlines with a one-hour advance notification. Norwood admitted that several times more than one-hour advance notice was given to American Airlines.

Norwood stated that when Tom Winkowski took over as Port Director at MIA, he abolished the advance notification policy. Norwood stated that Winkowski believed that the advance notification compromised USCS' security. Norwood stated that Winkowski's policy change was disseminated through a letter to all inspection personnel at the airport. (Exhibit 4)

On December 5, 2001, the OIG interviewed Ric Arner, Manager, International Operations, American Airlines, Miami, Florida. Arner stated that his job requires that he work closely with the USCS Cargo Enforcement Teams (CET) and the Inbound and Outbound Inspection teams. Arner stated that he coordinates with the USCS and American Airlines security, baggage, and maintenance personnel to facilitate inspections of inbound and outbound aircraft.

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Arner admitted that the USCS previously provided American Airlines with advance notification of outbound inspections. Arner stated that USCS inspectors would call the American Airlines Security Planner and provide advance notice and a list of aircraft to be inspected. The advance notification was usually one to one and a half hours prior to departure. Arner said that the advance notification allowed him to provide assistance to the USCS in the form of additional personnel to assist with baggage retrieval and passenger processing.

Arner stated that the advance notification policy came about after a facilitation meeting with Ahern and Norwood. Arner said that the facilitation meetings were held to find ways to improve and speed up the outbound inspection process. Arner said that several outbound flights were regularly delayed because of USCS outbound inspections. Arner said that because of major flight delays it was decided at a facilitation meeting that USCS inspectors would provide American Airlines with advance notification and in return American Airlines would provide additional personnel to assist with the inspection process. Arner said that Ahern made the decision to provide the advance notification and that no official memo was ever drafted to spell out the specifics of the advance notification policy. Arner denied that American Airlines was ever given any other preferential treatment from the USCS or Ahern. Arner stated that the advance notification policy was discontinued shortly after Winkowski became Port Director. (Exhibit 5)

On December 11, 2001, the OIG interviewed Thomas S. Winkowski, Area Port Director, Miami International Airport (MIA), United States Customs Service (USCS), Miami, Florida. Winkowski stated that he became the Area Port Director in March 1999. Winkowski admitted that prior to becoming MIA Port Director, advance notification was given to American Airlines before any Outbound Inspections. Winkowski stated that the week prior to his arrival in Miami, Raymond Kelly, Commissioner, USCS, visited the Port of Miami and spoke with Customs Inspectors in a "Town Hall Meeting." Winkowski stated that during the "Town Hall Meeting" several Inspectors complained to Kelly that the advance notification policy given to American Airlines and other carriers was jeopardizing their enforcement posture, thus reducing the number of seizures.

Winkowski said that once he arrived in Miami, USCS Assistant Commissioner Sam Banks informed him that Commissioner Kelly was opposed to the advance notification policy. Winkowski related that the decision to abolish advance notification, "was pretty much already made for me." Winkowski said that he drafted a policy letter and scheduled a meeting with American Airlines to give them the letter rescinding the advance notification policy.

Winkowski said that he talked to Ahern about the advance notification policy. Ahern admitted to Winkowski that he (Ahern) did order the advance notification policy. Winkowski related that Ahern told him that the decision to implement the policy stemmed from D. Lynn Gordon, former Director, CMC, Miami, Florida, and her emphasis on "Reinvention of Government" and complaints about flight delays from American Airlines. (Exhibit 6)

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On December 13, 2001, the OIG interviewed Jayson P. Ahern, Director, Field Operations for Southern California, Customs Management Center (CMC), United States Customs Service (USCS), San Diego, California. Ahern said that from October 1995, until his directed reassignment in February 1999, he served as the Port Director of Miami International Airport.

Ahern stated that at no time during his tenure at MIA, did he or any of his staff provide American Airlines with preferential treatment. Ahern admitted that he did institute a local policy at MIA, which instructed the USCS Outbound Inspectors to provide American Airlines and other airlines with a one-hour advance notification of flights to be inspected. Ahern admitted that this was his operational decision and was not directed by D. Lynn Gordon, former South Florida CMC Director.

Ahern said that he decided to provide advance notification of outbound inspections despite what the USCS inspectors thought. Ahern said that in no way did this policy negatively impact on USCS's ability to do the job. Ahern also said that the advance notification policy did not alert potential internal conspirators to USCS tactics. Additionally, Ahern said that he did not guarantee American Airlines that USCS would do this in all instances and some inspections were conducted at the last minute without prior notification. Ahern stated that when advance notification was provided it was given to American Airline's Security office or to an airline management official. Lastly, Ahern related that he had no information or intelligence that demonstrated that his decision compromised the efficiency or integrity of the enforcement mission.

Ahern admitted that he knew the decision would be unpopular with the inspectors on the Outbound team. Ahern stated that his decision was made with the Outbound Chief, Chief Inspector Michael Norwood, present and another member of the Outbound team. Ahern stated that he made his decision on merit and it was not for any personal gain. (Exhibit 7)

On January 21, 2002, the OIG reviewed documents obtained from the USCS Outbound Inspection Office. The documents included a Standard Operating Procedure Manual (SOP) and several Customs Directives (including 3290-016A Outbound Enforcement Team) and Policy notices. Documents also included Customs Handbook CIS HB 3300-03A, Currency and Other Monetary Instruments Interdiction Handbook. The USCS documents listed above demonstrate that no official USCS directive is in place for notification procedures regarding Outbound Inspections. Additionally, a copy of the USCS MIA Status Spreadsheet demonstrates that after Ahern instituted the advance notification policy money seizures dropped from approximately 9.7 million dollars in FY 2000, to 4.1 million dollars in FY 2001. (Exhibit 8)

On February 12, 2002, the OIG re-interviewed DeSanto. She stated that to date, the smaller airlines (ACES, Air France, ALM and Avianca) were no longer receiving advance notification

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from USCS. However, DeSanto stated American Airlines is still being notified approximately 1-1 ½ hours in advance of routine outbound inspections. DeSanto further stated that J.R. Russell and Wayne Russell, Senior Inspectors, USCS, were among those providing American Airlines security with advance notification. (Exhibit 9)

On February 12, 2002, the OIG interviewed station managers from ACES, Air France, ALM, and Avianca airlines. All four station managers stated they currently do not, nor have they ever, received advance notification from USCS regarding routine outbound inspections. In addition, most stated the only time any advance notification is given is when there is a lookout for an individual or cargo on a specific flight. (Exhibit 10)

On February 12, 2002, the OIG interviewed Mitch Segermeister, International Security Coordinator, American Airlines, Miami International Airport, Miami, Florida. Segermeister stated USCS would notify him in advance of inspections if they (USCS) had a BOLO for a particular passenger or cargo on a specific flight. Segermeister further stated he would receive this notification approximately 2-3 hours in advance, allowing time for the security team to pull the passenger and secure their bags at the jetway for inspection. Segermeister also stated the benefit for this advance notification was that it allowed security time to look for the specific bags, control passenger flow down the jetway, and in general help the USCS facilitate the inspection. Segermeister gave the names of Russell and Russell as two of the inspectors that generally provide advance notification. (Exhibit 11)

On February 12, 2002, the OIG interviewed John M. Russell, Senior Inspector, GS-13, USCS, Miami International Airport, Miami, Florida. Russell stated in the past, it was common practice to provide American Airlines with some type of advance notification. However, Russell said currently no advance notification is given to American Airlines or any other airline regarding routine outbound inspections. Russell further stated the only time advance notification is given is when there is a BOLO report or USCS is going to inspect checked baggage aboard a flight. Russell said the baggage notification is given to allow time for American Airlines to re-route the baggage to the designated USCS inspection area. (Exhibit 12)

On February 13, 2002, the OIG interviewed Wayne Russell, Senior Inspector, GS-13, USCS, Miami International Airport, Miami, Florida. Russell stated no advance notification is provided to American Airlines regarding routine outbound inspections. Russell further stated the only time American Airlines is provided any notification is when there is a BOLO report or when baggage inspection is going to be completed. Russell said the baggage notification is given to facilitate the re-routing of baggage to the USCS designated inspection area. (Exhibit 13)

Allegation #2: It was alleged that USCS management ignored BOLO reports regarding illegal cargo, specifically that management was no longer forwarding the reports to the team leaders.

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On February 12, 2002, the OIG interviewed Olejasz regarding USCS management handling of BOLO reports. Olejasz stated when the USCS is notified of a BOLO, pertinent information is recorded in the BOLO log, such as the name of the caller, itinerary of the individual or cargo, and which supervisor was notified. In addition, Olejasz stated this report is then filed in the BOLO log, under the date of scheduled travel. When the inspectors start their daily shifts, they are to check the log for any BOLO reports for that day. Olejasz said once the BOLO has been worked, there is a section at the bottom of the report for the inspector to complete as to the outcome of the BOLO. (Exhibit 14)

On February 13, 2002, the OIG conducted a document review of BOLO reports from Miami International Airport, Outbound Inspections, dated October 2001 through February 2002. A review of these documents revealed they were being properly documented and recorded in the BOLO log. In addition, the reports contained all the required information, including computer inquiries, as well as indicating a positive or negative disposition. (Exhibit 15)

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EXHIBITS

<u>Number</u>	<u>Description</u>
1	Letter of referral from Office of Special Counsel, dated August 30, 2001.
2	Memorandum of Activity, Eileen DeSanto, dated October 25, 2001, with attachments.
3	Memorandum of Activity, Chester Olejasz, dated October 25, 2001, with attachments.
4	Memorandum of Activity/Affidavit, Nathaniel Norwood, dated November 19, 2001, with attachments.
5	Memorandum of Activity, Ric Arner, dated December 5, 2001, with attachments.
6	Memorandum of Activity, Thomas Winkowski, dated December 11, 2001, with attachments.
7	Memorandum of Activity/Affidavit, Jayson Ahern, dated December 13, 2001.
8	Memorandum of Activity/Records Review, dated January 21, 2002.
9	Memorandum of Activity/Affidavit, Eileen DeSanto, dated February 12, 2002.
10	Memorandum of Activity, Airline Contacts, dated February 12, 2002.
11	Memorandum of Activity, Mitch Segermeister, dated February 12, 2002.
12	Memorandum of Activity, John M. Russell, dated February 12, 2002.
13	Memorandum of Activity, Wayne Russell, dated February 13, 2002.
14	Memorandum of Activity, Chester Olejasz, dated February 12, 2002.
15	Memorandum of Activity/Records Review, dated February 13, 2002.

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U.S. OFFICE OF SPECIAL COUNSEL
1730 M Street, N.W., Suite 300
Washington, D.C. 20036-4505

EXECUTIVE SECRETARIAT

2001 SEP -4 P 2:18

The Special Counsel

August 30, 2001

DEPARTMENT OF
THE TREASURY

The Honorable Paul H. O'Neill
Secretary
U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220

Re: OSC File No. DI-00-2079

Dear Mr. Secretary:

The U. S. Office of Special Counsel is authorized by law to receive disclosures of information from federal employees alleging violations of law, rule or regulation, gross mismanagement, gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety. 5 U.S.C. §§ 1213(a) and (b). As Special Counsel, if I find, on the basis of the information disclosed, that there is a substantial likelihood that one of these conditions exists, I am required to advise the appropriate agency head of my findings, and the agency head is required to conduct an investigation of the allegations and prepare a report. 5 U.S.C. §§ 1213(e) and (g).

For the reasons set forth below, I have concluded that there is a substantial likelihood that information provided to the Office of Special Counsel by Ms. Eileen M. DeSanto, a Senior Customs Inspector with the U.S. Customs Service, discloses gross mismanagement and abuses of authority, arising out of actions by Customs Service officials at Miami International Airport, Miami, Florida. Accordingly, I am referring this information to you for an investigation of the allegations described below and a report of your findings within 60 days of your receipt of this letter.

The Information Disclosed

As noted, the relevant information was provided to the Office of Special Counsel by Ms. Eileen M. DeSanto, a Senior Customs Inspector, who has consented to the release of her name. At the time of her disclosure to OSC, Ms. DeSanto had been a member of the Outbound Enforcement Team at Miami International Airport since 1992.

Ms. DeSanto alleges that, from 1997 to 1999, the Outbound Enforcement Team at Miami International Airport was ordered to provide American Airlines with a three-hour notice before the Customs Service searched any flights. As a result of the three-hour notice provided to American Airlines, several other airlines requested, and were granted, one-hour notices

EXHIBIT NO. 1

The Honorable Paul H. O'Neill
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prior to an inspection by Customs Service officials. According to Ms. DeSanto, although American Airlines is no longer provided three-hour notices, American Airlines and other airlines continue to be given one-hour notices to date. In addition, Ms. DeSanto alleges that the Outbound Enforcement Team no longer pursued "Be On the Look Out" (BOLO) reports received from other divisions of the Customs Service.

Ms. DeSanto's allegations are as follows:

In a meeting on September 16, 1997, between the Outbound Enforcement Team (Team), Jayson Ahern, former Port Director, and Michael Norwood, former Chief of the Outbound Enforcement Team, ordered the Team to provide American Airlines with at least a three-hour notice before any flights were searched. As a result of these orders, American Airlines representatives routinely called the Team each morning, and on many occasions spoke to Ms. DeSanto in particular, in order to get a list of flights that the Customs Service intended to search that day.

An important aspect of the duties performed by the Customs Service, and in particular the Team, is that neither American Airlines nor the passengers are aware that the Customs Service will conduct a search. Ms. DeSanto alleges that, prior to implementation of the advanced notice to American Airlines, the Outbound Enforcement Team was seizing between \$15 million and \$26 million in illegal cargo per year. After implementation of the notice to American Airlines, the seizure of cargo from American Airline flights was negligible.

As other airlines learned that American Airlines was receiving prior notice of Customs Service searches, according to Ms. DeSanto, they began to request advanced notice also. The Team was then ordered that Avianca, Air France, Aces Colombia, and Air ALM were to be given one-hour notices prior to any searches. Ms. DeSanto alleges that this one-hour notice policy is in practice today.

Moreover, Ms. DeSanto alleges that Customs Service managers ignored BOLO reports regarding illegal cargo on airlines. Other divisions within the Customs Service forward BOLO reports to the Team. The BOLO reports are created from information gathered in other investigations or from informants. The Team gives BOLO reports a priority among planned searches for the day. After the orders were given for the three-hour notice for American Airlines, BOLO reports were no longer forwarded to the Team members for their further investigation.

The Special Counsel's Findings

As noted above, if I find that there is a substantial likelihood that information disclosed to my Office reveals gross mismanagement or an abuse of authority, I am required to send that information to the appropriate agency head for an investigation and report. 5 U.S.C. § 1213.

The Honorable Paul H. O'Neill

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Given Ms. DeSanto's former position on the Outbound Enforcement Team and the detail she has provided, I have concluded that there is a substantial likelihood that she has disclosed gross mismanagement or abuses of authority at Miami International Airport.

Accordingly, I am referring this information to you for an investigation of the allegations described above and a report of your findings within 60 days of your receipt of this letter. By law, the report must be reviewed and signed by you personally. Should you decide to delegate authority to another official to review and sign the report, your delegation must be specifically stated. The requirements of the report are set forth at 5 U.S.C. §§ 1213(c) and (d). A summary of 1213(d) is enclosed.

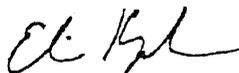
In the event it is not possible to report on the matter within the 60-day time limit, as the statute requires, you may request in writing an extension of time not to exceed 60 days. Please be advised that an extension of time will not be granted automatically, but only upon a showing of good cause. Accordingly, in the written request for an extension of time, please state specifically the reasons the additional time is needed.

After making the determinations required by 5 U.S.C. § 1213(e)(2), copies of the report, along with any comments on the report from the person making the disclosure and any comments or recommendations by me will be sent to the President and the appropriate oversight committees in the Senate and House of Representatives. 5 U.S.C. § 1213(e)(3).

A copy of the report and any comments will be placed in a public file in accordance with 5 U.S.C. §1219(a).

Please refer to our file number in any correspondence on this matter. If you need further information, please contact Catherine A. McMullen, Chief, Disclosure Unit, at (202) 653-6005. I am also available to you for any questions you may have.

Sincerely,



Elaine Kaplan

Enclosure

Requirements of 5 U.S.C. § 1213(d)

Any report required under subsection (c) shall be reviewed and signed by the head of the agency¹ and shall include:

- (1) a summary of the information with respect to which the investigation was initiated;
- (2) a description of the conduct of the investigation;
- (3) a summary of any evidence obtained from the investigation;
- (4) a listing of any violation or apparent violation of law, rule or regulation; and
- (5) a description of any action taken or planned as a result of the investigation, such as:
 - (A) changes in agency rules, regulations or practices;
 - (B) the restoration of any aggrieved employee;
 - (C) disciplinary action against any employee; and
 - (D) referral to the Attorney General of any evidence of criminal violation.

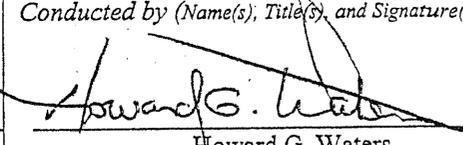
In addition, we are interested in learning of any dollar savings, or projected savings, and any management initiatives that may result from this review.

¹ Should you decide to delegate authority to another official to review and sign the report, your delegation must be specifically stated.



MEMORANDUM OF ACTIVITY



<i>Case Number:</i> 2002-0019	<i>Type of Activity:</i> Personal Interview	<i>Conducted by (Name(s), Title(s), and Signature(s)):</i>  Howard G. Waters Special Agent Date: October 31, 2001
<i>Date:</i> 10/25/01	<i>Reporting Office:</i> Miami	
<i>Time:</i> 11:00 a.m.		
<i>Subject of Activity:</i> Eileen DeSanto Senior Inspector Outbound Inspections United States Customs Service Miami, Florida		<i>Location of Activity:</i> Miami International Airport Miami, Florida

On October 25, 2001, the Treasury Office of Inspector General interviewed Eileen DeSanto, Senior Inspector, GS-11, Outbound Inspections, United States Customs Service (USCS), Miami, Florida. DeSanto was interviewed regarding allegations that USCS managers were providing American Airlines at Miami International Airport (MIA) three hour advanced notice prior to conducting outbound inspections.

DeSanto provided in substance the following information:

DeSanto stated that she has worked for the USCS since 1986. DeSanto works on one of the USCS Outbound Inspection Teams. She is responsible for conducting inspections of cargo, baggage, and passengers leaving the United States. DeSanto has worked at MIA since 1991.

DeSanto stated that between 1997 and 1999, the USCS Outbound Inspection Teams were required to provide a three-hour advance notice to American Airlines and a one-hour notice to other airlines. DeSanto said that then Port Director Jayson Ahern and Chief Inspector Nathaniel Norwood put this policy into place. DeSanto stated that Inspectors were required to call the airlines and give advanced notice prior to an outbound inspection. DeSanto indicated that at the Outbound Inspections office a notice was posted on the door with a checklist for Inspectors. One of the items on the checklist was a statement requiring the lead Inspector to provide advance notice to the airline that was going to be inspected.

DeSanto stated that management retaliated against her after she notified then USCS Commissioner Raymond Kelly in February 1998, about preferential treatment given to American Airlines. DeSanto said that in March 1998 she filed an Equal Employment Opportunity

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2

Commission (EEOC) complaint against Ahern and Norwood because of non-selection to supervisor. She (DeSanto) stated that in April 1998, management removed her from the Outbound Inspections Team and placed her in an office position. In May 1998, DeSanto applied for temporary details but was repeatedly turned down. DeSanto indicated that in June 1998, USCS Office of Internal Affairs (IA) reopened an old case against her. She said that in October 1998, managers at MIA took her weapon away from her. In December 1998, DeSanto received a letter stating that her weapon was taken away from her because of the pending IA cases. DeSanto said that she received a notice of proposed removal in June 1999, which was canceled and then proposed again in February 2000.

DeSanto admitted that she had referred herself to the Employee Assistance Program (EAP) for help with job related stress and an alcohol problem that she incurred as a result of the stress. DeSanto said that Norwood was the EAP representative at MIA. DeSanto stated that Norwood violated her confidentiality by discussing her drinking problems with other Inspectors and managers at MIA. DeSanto also stated that she was discriminated against because of disparate treatment of other Inspectors having alcohol related incidents and they did not receive any notice of proposed removal.

DeSanto provided the OIG with copies of her EEO complaint, Office of Special Counsel (OSC), complaint, last chance settlement with USCS, American Airlines International Operations Delay reports and other OSC correspondence.

Attachments:

REVIEWED BY (Initials): DB DATE: 11/9/01

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(202) 653-7188
(800) 872-9855

Form OSC 11 (2/97)
OMB Control No. 3255-0002

REPORT OF POSSIBLE PROHIBITED PERSONNEL PRACTICE OR OTHER PROHIBITED ACTIVITY

(Please print or type and complete all items. Enter "N/A" (not applicable) or "Unknown" where appropriate.)

1. Name of person requesting Office of Special Counsel (OSC) action ("requestor"):
EILEEN DESANTO
2. Position title, series and grade: Senior Inspector GS-1890-11/5
3. Agency name: U.S. CUSTOMS SERVICE
4. Agency address: 6601 NW 25TH ST. MIAMI FL. 33129
5. Home or mailing address: 790 S. PARK RD. Apt 6-31
Hollywood FL. 33021
6. Telephone number: (954) 834-7960 (home)
(305) 526-7472 (office)
7. Are you covered by a collective bargaining agreement? (check one)
 Yes No I do not know
8. If submitted by someone other than the requestor, please complete the following:
Name and title of submitter: Mary Catherine Bonner Attorney at Law
Address: 207 SW 12TH ST. FL. Lauderdale
FL. 33015
Telephone number: (954) 523-6225 (home)
() (office)

USE OF THIS FORM TO REPORT PROHIBITED ACTIVITY IS NOT MANDATORY

(over)

J. W. Q. 11

American Airlines issues raised during town hall meeting in Miami.

ISSUE:

Recently the Commissioner held a Town Hall meeting for Customs personnel in Miami, Florida. Among the issues raised by the Customs employees present, there were four with regard to American Airlines. They are as follows:

- U.S. Customs in Miami gives American Airlines preferential treatment.
- Customs personnel must have an American Airline Mechanic accompany them when performing an aircraft search.
- U.S. Customs gives American Airlines a one hour notice prior to performing an outbound examination of a departing flight.
- Customs personnel must remove the X-Ray van five minutes prior to departure time of an American Airlines flight.

FINDINGS:

The Miami office was contacted regarding the above issues and were asked to comment accordingly. The following reflect the answers compiled by the Acting Airport Director, Airport CET Chief, and Outbound Enforcement Chief.

- **U.S. Customs in Miami gives American Airlines preferential treatment**

Initial data does not indicate that American Airlines receives any preferential consideration.

There are two charts that were compiled depicting the number of American Airlines planes that were searched in comparison to other airlines.

One chart depicts the flights searched by CET and what percentage of CET searches an Airline receives. American Airlines counts for 13.53% of CET searches. (SEE ATTACHED)

The other chart looks at (for the month of Jan only), total international arrivals by airline and shows the percentage of CET searches. 6.48% of American flights were examined. (SEE ATTACHED)

To get an exact picture of American in comparison to other Airlines, one would have to factor in the country of origination for each flight, the risk factor of each country, how the risk was

...ored in when selecting flights to search, and any other variable that goes into selecting lines for examination. At this time the port was not asked to perform this analysis.

- **Customs personnel must have an American Airline Mechanic accompany them when performing an aircraft search.**

Since 1/98 this has not been the policy in Miami.

Chronology -AA Aircraft Search/Mechanics Issue

May 9, 1997

While searching an AA aircraft, a CET inspector opened a speaker panel in the ceiling of the lavatory. This accesses an area where drugs have been found in the past. When she took out the first of four screws, the panel fell to the floor, which tore the speaker wires. She immediately located AA personnel at the jet bridge and advised them of the damage. The repair of this panel caused a 22 minute delay in the departure of that aircraft.

- ▲ That same date, on another AA aircraft, there was a material failure on a/c door latch which they assumed Customs had done, but Customs inspectors indicate they had not; to their knowledge, damaged any door latch.

- ▲ On a third aircraft, the same date, there was damage to the right emergency exit oxygen panel. It appeared to have been torn out and thrown on the ground; all wires behind the panel were pulled. Customs shift reports indicated that CET did not work that flight. Customs was told by AA that a CEO and dog went onboard alone. Despite our questioning, we were never able to determine whether this was true. Other factors which made this allegation questionable were that Customs CEO's do not search planes individually, and all Miami CET officers are trained to immediately report any damage resulting from their activities. Reporting damage is routine for CET inspectors.

Customs did learn that a number of the "security mechanics", whose job it was to support CET when needed, had been given notice that they were to be laid off. As a result of the above incidents, all those who were to be laid off were retained by AA's to open all panels CET wished to open.

(It was the policy of AA that all damage to an aircraft be reported directly to Mr. Crandell, the CEO. Subsequently there was a meeting of AA management with its Chief Pilot, and Art Torneau, VP in Charge of Miami operations. Mr. Torneau decided he did not want any aircraft touched by Customs. He believed that

because we did not possess FAA mechanics' certificates, we were violating FAA regs every time we opened a panel. He decided to make mechanics available to open panels when requested by USC, and conveyed his concerns to the CMC.)

A decision was made locally to use the mechanics to open panels and discontinue the opening of panels by CET personnel. Shortly after this new policy was initiated, the aircraft search/mechanic issue was brought to the SPS. Counsel was enlisted to explore the legality issues, and a subgroup of inspectors and AA mechanics was formed to work out issues of narcotics concealment areas on the various aircraft and report to the larger SPS group. A legal opinion of the search authority was sought from and drafted by Associate Chief counsel. It was received in November, 1997, and the new search procedures, in which CET opens panels, then advises AA mechanics as to what panels are open so they may secure them was implemented in January, 1998.

Port management closely monitored this procedure for some time. There have been no issues, conflicts or questions in this area for many months.

- U.S. Customs gives American Airlines a one hour notice prior to performing an outbound examination of a departing flight.

Local Policy. Not in writing. Oral instructions to employees.

On or about 1991, in a Carrier Initiative workout session with AA, a suggestion was made for Customs to give AA an hour notice when Customs wanted to examine a flight. This would allow AA to make arrangements to get more resources to that flight, thus expediting/mitigating the impact. AA has come to feel this is their right and that we are in violation of policy if they don't get the notice. Customs Supervisors report that instead of sending resources to expedite the flight, AA now sends one person with a clipboard who stands there, takes notes and continually harangues the Customs personnel with comments about calling HQ's and the CMC.

The Port is being instructed to reevaluate this position and create a policy that is consistent with all airlines.

It is understood why this advance notification agreement was implemented, and how it is not consistent with the national Outbound policy. Also, by having this one hour notification in place it may possibly compromise Customs' enforcement posture. Therefore, in order to be consistent with national policies, advance notifications to all airlines will be discontinued.

3 hrs for
AA
1 hr other
Colombian
BASOP FL

- Customs personnel must remove the X-Ray van five minutes prior to departure time of an American Airlines flight.

The following procedures are to be followed prior to conducting a currency interdiction operation involving passengers, crew and carry-on luggage. These procedures will assist in successful prosecution, and forfeiture of unreported currency or monetary instruments.

1. Determine which areas of the airport will be covered:

a. Check-in counter—Offers an excellent vantage point to pre-screen passengers as they check their luggage and obtain boarding passes.

At this location the Customs officer can determine which passengers are traveling together, who dropped suspects off at the airport, demeanor of passengers, and other targeting techniques similar to those used during inbound processing.

Suspicious persons should be identified to Customs officers stationed at the security checkpoint and jetway.

b. Security checkpoint—The Customs officer at security monitors the X-ray images as passengers proceed through the metal detector.

Suspicious persons or hand carried luggage should be identified to Customs officers in the departure lounge or jetway.

It is important to note an accurate description of the item as well as the person. The item may be given to another passenger in the departure lounge, especially if the suspect realizes that Customs officers are conducting currency interdiction operations.

c. Departure lounge—Customs officers in the departure lounge identify high risk passengers. Officers also note passengers who depart the area when the announcements are made and/or currency interdiction operations begin.

d. Jetway leading to aircraft—This is generally considered the last point of departure for purposes of filing the CF 4790. Officers here will conduct the title 31 stops and interviews. If other officers are deployed elsewhere (check-in, security, baggage, lounge) they should converge on the jetway at boarding time to assist in interviews.

2. Notify the airline of intent:

a. Advise an airline supervisor that Customs intends to perform an outbound inspection of a particular flight. The passengers are not to be informed unless currency interdiction team leaders/OI, in consultation with the local U.S. Attorney, determine that there is a need to announce currency reporting requirements over the public address system before initiating any inspections.

Local Policy. Not in writing. Oral instructions to employees.

Awaiting further details from the port.

The port is being instructed to reevaluate this position and create a policy that is consistent with all airlines.

While this policy is not contradictory to Outbound's mission it may lend itself to internal conspiracies. Miami Outbound Team's SOP. will be reviewed and modified, as necessary, to ensure that Outbound Supervisors are held accountable in deciding when and if equipment/ personnel are pulled off a flight to avoid flight delays.

The following sequence of events occurred on Saturday 05, 1996 while doing an examination of the baggage and passengers on American Airlines flight number 277 destined to Port Au Prince. Operations was informed at 1130 on 100496 by Chief Norwood and SI Pinkus that this flight was selected for examination.

0630 Outbound team arrived at American Airlines baggage pit, Pier 15. The crew chief was asked which way would be easier for us to inspect the baggage, using our mobil x-ray or using their fixed x-ray. Crew Chief stated that baggage personnel were not informed of the customs examination.

0645 The mobil x-ray was chosen and the Outbound Team started x-raying baggage.

0720 Security showed up at Pier 15 and told SI Pinkus that they were just informed from Operations that we were doing the flight.

0730 The baggage personnel stopped bringing luggage between 0730 and 0750 due to heavy rain.

0750 X-raying of baggage resumed.

0815 Baggage closed at ticket counter.

0815 Six oversize baggage carts were brought over for x-raying and at that time sent to the American Airlines x-ray machine with one of the customs inspectors so we could finish x-raying in time. Two American employees (volunteered to help) assisted the customs inspector to finish the six cans of baggage because no personnel were at that location to help.

0830 Additional bags arrived to be x-rayed and taken to the plane.

0850 Supervisor Greg Garcia went to the ITI x-ray and became very upset with the American personnel and the customs inspector. He wanted to know why ITI was not informed about the x-raying of bags, why customs was there and said he got a phone call reprimanding him for not having his people in place. Now he was going to chew on someone to protect himself. SI Pinkus asked the inspector at the x-ray to please ask that supervisor to come over to Pier 15. Upon Mr. Garcia arriving at that location, SI Pinkus ask him why he yelled at the customs inspector. Mr. Garcia stated that it was not customs problem, but an internal one, then apologize if he had acted unprofessionally.

We would like to extend our thanks and a "WELL DONE" to the Crew Chief, Alfredo, Caesar and the other three baggage persons (my apologizes for not obtaining their names) that worked through their break to assure customs got the examination complete.

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30

ATTACHMENT: SENIOR INSPECTOR EILEEN DE SANTO
SSN 097-42-3648

Senior Inspector Eileen De Santo is assigned to Passenger Processing at Miami International Airport. Since Inspector De Santo has arrived she has proven to be a true asset to this organization. She has made 6 seizures in the past 6 months. She has immersed herself in the secondary area and has, most importantly, assisted other inspectors in discovering contraband, and affecting seizures.

There were at least 6 occasions that I personally witnessed, where Inspector De Santo unselfishly gave her time to assist another inspector in the detection of the contraband and the processing of a seizure. She has adopted the attitude of a trainer of other inspectors and is probably responsible for the large number of seizures being made by novice inspectors during the last few months. She cares about what she is doing and everyday, it is evident that she is showing up to put in a day's work. There have many days where I have had nothing but Summer Temporary personnel and relatively new inspectors straight from graduation from FLETC. Inspector DeSanto was the only experienced person that was available and she has consistently responded in a very positive way. She has shown to be very cooperative with me and has shown how to do the job to numerous inspectors.

She is a strong believer in enforcing the law and if she feels that something is amiss she will pursue the issue with vigor. There was one occasion where a passenger came to her in secondary and she found that he was an American Airlines employee arriving from Columbia on an Avianca flight. He also had an attitude. Inspector promptly gathered all the information, made contact with AA management personnel, kept me informed and put this information in the computer. Since that time, we have seen the same scenario being played with other American Airlines employees and have started the beginnings of an investigation for conspiracy. This would not have happened if Inspector De Santo had not taken the initiative. She has done this on several occasions.

Since Inspector De Santo arrived in Passenger Operations, she has proven to be a valuable asset. She has been cooperative, has shown a desire to work hard, and has been willing to assist others. For these reasons, I recommend that Senior Inspector De Santo be awarded 3 shares.

SETTLEMENT AND LAST CHANCE AGREEMENT

In the interest of resolving the proposed removal of Ms. Eileen DeSanto (employee) from the Customs Service, the undersigned parties hereby agree to the terms of this Settlement and Last Chance Agreement in lieu of a decision on the proposal as follows:

1. This Settlement and Last Chance Agreement ("Agreement") pertains to the Agency's February 11, 2000, letter proposing to remove Ms. DeSanto from her position as Customs Inspector, Office of Field Operations, Miami International Airport, Miami, Florida. A copy of the proposal letter is attached. The Agreement remains in effect for a period of ~~three~~ years from the date that the Agreement is executed by all parties.
2. The employee admits that she engaged in the misconduct described in the Agency's February 11, 2000, proposal letter and agrees that the employee will serve a thirty-day suspension to be effective without challenge
3. The Employee agrees to immediately contact the Customs Employee Assistance Program (EAP) and accept the referral and agrees to actively participate in the EAP within 24 hours by:
 - a) Scheduling and keeping all appointments required by the EAP, (b) providing intake assessment and information to the EAP counselor, (c) following the EAP counselor's recommendations, (d) accepting referral for evaluation and/or treatment, when indicated, and (e) remaining a voluntary and active participant in the EAP throughout treatment and follow-up, until such time as is mutually agreed upon by the EAP Counselor and the treatment provider(s).
4. The Employee agrees to sign specific Release of Information Forms for the Employee Assistance Program counselor and treatment provider(s) so they can share with U.S. Customs Service management information regarding treatment attendance and progress. *Did this for Raphael + Eileen's treatment*
5. The employee agrees to continue to follow the treatment plan prescribed by a recognized substance abuse treatment program, including participating in an alcohol testing program if required to do so, and provide written progress reports from that care provider to her supervisor on a monthly basis, until such time as a recognized medical authority from that treatment program determines that such treatment is no longer necessary to assure the employee's freedom from substance dependency. Ms. DeSanto will sign the required release of information form to permit the reports to be submitted to her supervisor. *EAP*

(CANNOT BE FREE FROM ALL OF DEPENDENCY HAS BEEN AT POINT OF SINCE TODAY... TIME FOR REFERRAL CENTER AND TREATMENT T. J. [Signature]

5

Lack of active EAP participation (i.e., refusal to acknowledge the problem(s), not adequately working toward resolving the problem(s), declining appropriate referral for treatment, refusing to sign the release of information forms, and failure to make and keep appointments), will result in the EAP case being closed. EAP will report the noncompliance and failure to adhere to the "Last Chance Agreement" to Chief Inspector Mary Meier or Port Director Thomas S. Winkowski.

6

Within 30 days of signing this agreement, the employee agrees to undergo a "Fitness for Duty" medical examination to determine whether she is able to perform assigned duties safely and efficiently. The agency will identify the appropriate physician(s) and will pay for the examination(s). If the employee is found unfit for duty by the fitness for duty examination, it will be considered as a breach of the Last Chance Agreement, and she will be terminated in accordance with paragraph 10 below.

8

In further consideration of the agency's placing in abeyance its decision on the proposed removal, Eileen DeSanto agrees to withdraw all pending EEO complaints filed against the agency, whether formal or informal, that exist as of the date Ms. DeSanto signs this agreement. This includes the withdrawal of T.D. Case No. 98-2273 and T.D. Case No. 99-2186T, including the hearings that Ms. DeSanto has requested before an EEOC Administrative Judge in EEOC Case No. 150-99-8358X and EEOC Case No. 150-99-8830X. This also includes the withdrawal of T.D. Case No. 00-2204. This further includes any other EEO complaints not specifically referenced. Ms. DeSanto agrees that her signature on this agreement effects the withdrawal of her EEO complaints and requests for hearings, and that the agency may send a copy of this agreement to the EEOC as proof thereof. Ms. DeSanto agrees that the withdrawal of her EEO complaints is voluntary, without duress or coercion.

9

The Customs Service will hold in abeyance its decision on the proposal to remove Ms. Eileen DeSanto from the Customs Service (as set forth in paragraph 1), for a period of two years.

10

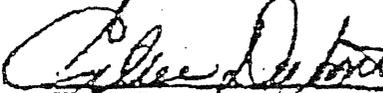
Non-Compliance and Termination- If the employee engages in further misconduct or fails to comply with the terms set forth in items 2 through 9 of this Agreement, the parties agree that such conduct, and/or failure to comply will result in immediate termination of the employee's employment with the U.S. Customs Service.

11

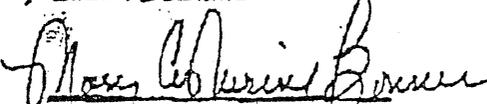
If the employee is terminated or removed pursuant to provisions of the agreement because of any violation of its terms, it is understood that all of the employee's statutory and contractual appeal rights, including all grievance and appeal rights to the Merit Systems Protection Board, or pursuant to the National Agreement between the National Treasury Employees Union and the U.S. Customs Service

relative to termination for the reasons set forth in the proposed removal letter dated February 11, 2000, are hereby waived. 10

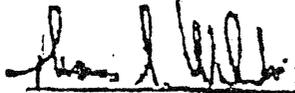
12. All parties enter into this Agreement freely and voluntarily, without threats or coercion of any kind.
13. Each party will bear its own attorney fees and costs, if any, in connection with this matter.
14. This settlement represents the entire agreement between the parties. The parties acknowledge that the terms and conditions of this Agreement are understood and fully acceptable.
15. This Agreement has been reviewed by the parties and the terms and conditions are understood and acceptable to all parties.
16. The terms of this Agreement shall be kept confidential by the parties and will not be communicated to others, except to those who have a need to know, in the conduct of their official business; in order to effect the terms of this Agreement or to address claims raised with non-compliance or future disciplinary actions, in accordance with applicable regulations and statutes.
17. Effective date - The effective date of this Agreement is the date on which all signatories below have signed.


Eileen DeSanto

10/19/00
Date


Mary Catherine Bonner
ATTORNEY AT LAW

10/19/00
Date


Thomas S. Winkowski
Acting Director
CMC, South Florida

10-13-2000
Date

Author: SANDRA E WISOTSKI
Date: 7/5/00 11:14 PM
Priority: Normal
TO: CHESTER W OLEJASZ
CC: ALEXIS COLEMAN, RUBEN NMI GONZALEZ
Subject: American Airlines Flight #1901 - Santo Domingo

Message Contents

FYI

Outbound Currency Task Force target AA 1901 to Santo Domingo. alerted to PAX Gladys Rodriguez at approximately 17:00. Domestic travel, tail-to-tail from Anchorage to Dallas to MIA. K-9 Sonya alerted to PAX in jetway. PAX had 5 bag tags. On CF 503, PAX declared \$1,000. Patdown was requested by SI and SCI Wisotsky granted approval. PAX at first refused Patdown. PAX advised she had \$50,000.00, currency on her body. Ultimately a patdown was initiated. PAX was escorted to Outbound office.

Search of the bags by American only turned up 3 bags of the 5. Richard Ramcharitar, AA Customer Service Manager, advised SI Russell, J. that they would bring back the bags from Santo Domingo if they locate them. I spoke with S/A N. Bright and we both felt very strongly that if we left the bags go, we could have a repeat of the previous weeks where we didn't get the bags returned timely. Also we had allowed AA to bring back the Jamaican bags on the seizure two weeks ago, and they failed to do so. I advised the team to keep searching till AA located all 5 bags. AA was having difficulty locating the bags as they could not match bag tags to the bags that were manifested. I contacted AA International Manager, Ric Arner, and advised him what we were told by the AA gate agent "they do not manifest the transit bags and do not know where the bags are located in the aircraft." AA also stated that the Dallas flight came into MIA between noon and 1300 hours. AA does not put the transit number on the log or on the can. Ric Arner advised me that the 2 bags could possibly not be on the Dallas/Ft. Worth flight to MIA, he would not know until the next day when he could trace the routing out of Dallas.

Mr. Alfred Cuyar, AA Managing Director arrived at planeside and also advised me that they do not manifest transit bags. I explained that we are sorry for the delay, however this is serious, as they do not know location of the transit bags or whether the bags are on the flight. I explained that there are times we are trying to locate explosive devices or anti-terrorism targets and this could be detrimental to the safety of 150 to 200 PAX's. He stated he would immediately look into this situation to rectify local bag policy.

The two missing bags could not be located and the flight was approximately one hour delayed. I authorized departure without locating the two bags. AA Richard Ramcharitar advised they would contact us as soon as they located the bags either in Santo Domingo or Dallas.

Sandy

OPERATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT:

AIRCRAFT TYPE:
(Circle one)

AS00 757 727 MD11 S80 D10

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
961	07/31	C10	1655	1707	12	040	E-9	168

Connx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
E-PIANNER	1545

Time CET Advised:	Random Search	Nbr GET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	4 J/B: 4	1657 J/B: 1600	1707 J/B: 1707

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

US, CUSTOMS BEGUN X-RAYING BAGS PLANE SIDE AT 1559.....
 THERE WERE TWO X-RAY MOBILS AND BOTH BELLIES WERE LOADED
 AT THE SAME TIME. EVERYTHING RUNNED SMOOTHLY, FWD BELLY
 CLOSED AT 1650. AT 1646 PAX GOMEZ/O XFR FLT 1977 ORD
 IN AT 1610 D-9 WAS PROFILED AND AFTER ROUTINE QUESTIONS, AT
 1654, HIS BAG WAS REQUESTED, AT THE SAME TIME US, CUSTOMS
 WAS ABOUT TO REMOVE THE X-RAY MOBIL FROM THE AFT BELLY,
 THERE WERE NO MORE BAGS AT THE GATE, THE CREW CHIEF WERE
 STILL LOOKING FOR THE BAG REQUESTED BUT APPARENTLY IT WAS
 NOT MANIFESTED, MEANWHILE, AT 1654 A HALF CART WAS RCVD
 WITH T1334 BAGS, THERE WERE RCVD SEVERAL DIFFERENT SINGLE
 BAGS FROM DIFFERENT TRIPS, AT 1657 THE BAG REQUESTED BY US,
 CUSTOMS WAS RCVD, AND AT 1659 ONE CART FULL OF BAGS FROM
 FLT 898 LAX IN. AT 1607 D-15. LAST BAG LOADED AT 1704
 AFT BELLY CLOSED AT 1706. DFS BEEN AWD OF ALL AT THE TIME
 ALL EVENT OCCURED. PAX GOMEZ/O WAS CARRYING EXCESSIVE
 AMOUNT OF USD IN HIS POCKETS.

FL961/31JUL MIA DM
 FL961/31JUL MIA DM ACFT SEL

Sgt. Officer

31 2116 9COBAF MIA-E9H
 DM961/31 MIA 12/04D USC CHKG PSGRS & BAGS UP/DOWN

END HISTORY

DELAY WAS NOT CAUSED BY THE OUTBOUND TEAM
 TRANSFER BAGS FROM 898 WERE BROUGHT TO PADSIDE
 AT 1700, ADD CUSTOMS LEAD SGT RUSSELL NOTIFIED SECURITY.
 PAX GOMEZ'S BAG WAS ALREADY TAKEN OFF THE AIRCRAFT
 AT 1657 ADD NOTIFIED THAT PAX GOMEZ WAS NOT FLYING, EVEN
 BEFORE THE TRANSFER BAGS WERE BROUGHT TO FLT 961.
 DELAY.XLS 1/12/98

**AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT**

OUTBOUND FLIGHT: AIRCRAFT TYPE: **A300** 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
711	06/04/00	SDQ	1100	1107	07	040	D19	162

Conn Time	# Conn Psgrs	# Conn Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
SUZANNE	0956

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
N/A	Yes/No	J/B: 3	J/B: 1000	J/B: 1108

Positive Find ?	How Much ?	Message Sent ?
/	/	Yes/No Attach

US CUSTOMS /CET TEAM/ PROFILED FLT, 1711 SDQ, PAXS AND BAGS THE FIRST PAX BOARDED AT 1024 THERE WERE TWO CET AGTS AND ONE K-9 SCREENING PAXS IN THE JTBG, WHILE THE REST OF THE TEAM WERE AT THE BAGROOM X-RAYING BAGS EVERYTHING /PAXS FLOW AND BAGGAGE LOADING/ WAS SMOOTH, UNTIL AT 1051 THE LAST PAX BOARDED AND SEC ASKED TO CLOSE THE DOOR BUT PAXS SUC WAS STILL WAITING FOR SOME MORE MEALS REQUESTED FEW MINS AGO. MEANTIME SEC DRIVER ADVD THAT US CUSTOMS CEASED X-RAYING BAGS LEAVING THE BAGROOM, AND THERE WERE THREE CTS STILL THERE. AT 1054 THE CTS WERE BROUGHT TO THE GATE AT 1055 THE SAME WERE AT THE GATE AND LOADER, AT 1106 THE LAST CT WAS LOADED AND AT 1107 AFT BELLY CLOSED.

FL1711/04JUN MIA DM
FL1711/04JUN MIA DM ACFT 076

04 1552 9C08AF MIA-FSL
DM 1711/4 MIA 7/04D
CET XRAY IN BAGROOM / UNABLE TO MOVE IN WAVES FROM BAGROOM

END HISTORY

Were bags sent to Carousel #8 for CET inspection?:

Were there piggybacking issues on Carousel #8 for this flight?:

Are you aware of any Carousel changes for this flight in Customs?:

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
961	05-19-00	CLO	1655	1701	6	04D	25	135

Connx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
Gregg	1600

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B:	J/B: 1600	J/B: 1701

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

U. S. CUSTOMS //CET TEAM// SCREENING PAXS ON FLT 961 CLO INBOUND FLT 2115 EWR IN AT 1525 AND SEC CLRD AT 1553 AT THAT TIME CABIN SVC WAS NOT PRESENT THE SAME ARRIVED AT 1605, FINISHING AT 1630. THE FIRST PAX BOARDED AT 1631, SEC PLANNER ADV'D OPS THAT THE BOARDING PROCESS WAS VERY SLOW DUE TO THERE WAS ONLY ONE PLUCKER AND THE SAME WAS SLOW. AT 1648 THERE WAS A PROFILED PAX ON THE JETBRIDGE, ALL PAXS WERE BOARDED ALREADY, AND SEC ADV'D THE GATE CSM THAT THEY NEED TO CLOSE THE DOOR, BUT AT 1652 THE FLIGHT ATTENDANCE HAD TWO CARRY-ON BAGS THAT COULD NOT BE ABLE TO ACOMODATE ON BOARD, AT 1654 THE GATE AGT WENT TO THE COUNTER TO GET BAGS TAGS, AT 1657 THE CSM BROUGHT THE BAGS TO THE RAMP LOADED IN THE FWD BELLY, AT 1658 ANOTHER BAG WAS GIVEN TO THE GATE AGT. AT THIS TIME MOST OF THE PAXS WERE STILL TRYING TO HAVE A SEAT. AT 1701 THE A/C DOOR WAS CLOSED.

19 2227 9C08AF MIA- EYC

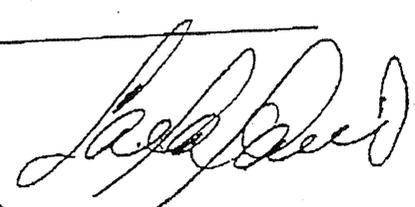
DM961/19 MIA 06/04D CUSTOM CKG DEPARTING PSGRS GOMES/7200 DOLLAR AND CASTRO/3000 DOLLARS ON JETWAY

END HISTORY

Were bags sent to Carousel #8 for CET inspection?:

Were there piggybacking issues on Carousel #8 for this flight?:

Are you aware of any Carousel changes for this flight in Customs?:



AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: 961 AIRCRAFT TYPE: A300 (757) 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
961	2/25/00	CLO	1650	1749	59	77Q	D14	90

Connx Time	# Connx Psgrs	# Connx Bags	# Large Party

RMOD Contact	Time Contact
GREG	1645

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
N/A	Yes/No	Z J/B: 8	1610 J/B: 1610	1749 J/B: 1705

Positive Find ?	How Much ?	Message Sent ?
YES	EXCESS \$ AMOUNT	Yes/No Attach

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors

Nbr Cust Inspectors

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:

Positive Find ?	How Much ?	Message Sent ?
		Yes/No

MIAQFAA

.MIAQFAA 260012 256A20 MIA/MAR

***** DELAY OF FLT 961 D14 2/25/00 *****

1610. US CUSTOMS ON JET BRIDGE AND RAMP.
 1645. US CUSTOMS REQ BAG PULL FOR TWO PAXS. WOMAN AND CHILD.
 1645. GREG AT OPS ADVSD.
 1655. US CUSTOMS REQ ANOTHER BAG PULL FOR TWO MORE PAXS. BOTH NO SHOWS. ONE ASKING FOR POLITICAL ASYLUM, THE OTHER RAN UPON SEEING US CUSTOMS.
 1657. CAPT ADVSD. GREG AT OPS ADVSD.
 1705. AIRCRAFT DOOR CLOSED. JETBRIDGE PULLED. CET OFF JET BRIDGE
 1747. US CUSTOMS OKD 961 TO DEPART. CET OFF RAMP.
 TOTAL OF SIX BAGS ASKED TO BE PULLED. FIVE WERE LOCATED. SIXTH NOT MANIFESTED. US CUSTOMS FOUND AN EXCESS AMOUNT OF US CURRENCY ON THE WOMAN WITH CHILD AND DOG HIT ON ONE OF PAXS BAG. THE SIX BAGS REQ TO BE PULLED FOUR BELONG TO WOMAN AND CHILD. OF THE FOUR THREE WERE LOCATED. THE FOURTH NOT MANIFESTED AND YET TO BE LOCATED.
 1815 RMOD MARK NELSON ADVSD FULLY OF DELAY AND CODED IT 77Q.

26FEB0012

PO01631-MIAAA 0128

Seizure \$104000

- AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 (757) 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
953	01/22/00	TGU	1125	1146	21	040	E11	143

Connx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
N/A	N/A

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B:	J/B:	J/B:

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
/	/	/

INBOUND FLIGHT: AIRCRAFT TYPE: A300 (757) 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
953	LGA	1009	1013	4	WX	E11	167

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors
/	/	/	/	/	/

Nbr Cust Inspectors
/

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B:	J/B:	J/B:

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
/	/	/

U.S. CUSTOMS//OUTBOUND CET TEAM// PROFILED AA953 TGU AT E-11. FAXS AND BAGS, SOME BAGS WERE X-RAYED BUT THE PROCESS WAS INTERRUPTED AS SOON AS THE LAST FAX BOARDED AT 1105. AT THIS TIME THERE WERE STILL SEVEN FULL CARTS OF BAGS THAT NEEDED TO BE LOADED. ACCORDING WITH SEC DRIVER U.S. CUSTOMS ARRIVED AT THE GATE AFTER 1045.....

FL953/22JAN MIA DM
FL953/22JAN MIA DM ACFT SCH

Lela Olin

22 1629 3A3FOA MIA-CDD
DM953/22 MIA 01/98

22 1743 9C08AF MIA-7JT
DM953/22 MIA 21/04D

CET TEAM X-RAYING BAGS / 2 OFFICERS / DISCONTINUED 10MINS PRIOR TO DEPARTURE / 7 FULL CARTS OF BAGS STILL NEEDED TO BE LOADED.

DELAY1.XLS

1/13/98

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 (757) 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
961	09/09	CLC	14:55	17:50	29	04D	E3Z	105

Conx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
JOSE DPS	16:05

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
No	(Yes/No)	J/B: 0	J/B: 17:20	J/B: 17:18

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

INBOUND FLIGHT: AIRCRAFT TYPE: A300 (757) 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
1796	MBJ	1528	1604	38	AUTEG	E3Z	155

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors
/	/	/	/	/	/

Nbr Cust Inspectors
/

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B:	J/B:	J/B:

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

DET outbound was profiling flight 961 (CLC) when at 16:04 they held a bag with an unsealed amount of money. Tax bags were requested by DET to be pulled at 17:05. Bags were found and pulled at 17:18. This was the reason why there was a 29 min. delay.

Were bags sent to Carousel #8 for CET inspection?:

Were there piggybacking issues on Carousel #8 for this flight?:

Are you aware of any Carousel changes for this flight in Customs?:

FL961/09SEP MIA IM
IT961/09SEP MIA IM ACFT SCK

09 2203 9CORAF MIA-7X2
JH961/9 MIA 29/40
DET REQUESTED BAG REMOVAL

IND HISTORY

- AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT:

AIRCRAFT TYPE:
(Circle one)

A300 757 727 MD11 S80 D10

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
1901	08/19	SDQ	1715	1720	5	04D	D11	256

Conx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
SOZANE	1535

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
4:20	Yes/No	N/A	N/A	J/B: 1720

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

INBOUND FLIGHT:

AIRCRAFT TYPE:
(Circle one)

A300 757 727 MD11 S80 D10

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
916	BOG	1502	1450	N/A	N/A	D11	112

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors
/	/	/	/	/	/

Nbr Cust Inspectors
/

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B:	J/B:	J/B:

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

U.S. CTMS PROFILED FLT 1901 SDQ //PAXS ONLY//
THE FIRST PAX BOARDED AT 1630, BUT U.S. CTMS REQSTD FIVE PAXS AT THE TIME, IN ADDITION, ONE OF THE U.S. CTMS AGTS REQSTD THE JTBG DOOR CLOSED, THAT IT MADE VERY DIFFICULT FOR THE SEC AGT TO SEE THE PROCESS. INTL SEC SDQ WAS NOT PRESENT UNTIL 1711 DUE TO AT THE SAME TIME FLT 961 CLO WAS ALSO PROFILED.

Solo

FL1901/19AUG MIA DM
FL1901/19AUG MIA DM ACFT 079

19 2125 24F1FA MIA-SOL
DM1901/19 MIA 5/AD
CET ACTIVITIES

Are you aware of any Carousel changes for this flight in Customs?:

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A360 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
377	3-17-99	PAP	0825	0912	47	040	C1	266

Conx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
/	/

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B: 10	J/B: 0810	J/B:

Positive Find ?	How Much ?	Message Sent ?
YKS	UNDISCLOSED	Yes/No Attach

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl-Gate	Load In
/	/	/	/	/	/	/	/

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors
/	/	/	/	/	/

Nbr Cust Inspectors
/

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B:	J/B:	J/B:

Positive Find ?	How Much ?	Message Sent ?
/	/	Yes/No Attach

MIAQFAA
MIAQFAA 171913 256A20 MIA/5JH

DURING THE X-RAYING OF BAGS FOR SELECTEES AT THE CONCOURSE FOR FLT 377 MIA/PAP A LARGE AMT OF UNDECLARED CURRENCY WAS DISCOVERED IN ONE OF PAX TIFFANY BUCKINS BAGS. HOWEVER DUE TO MISCOMMUNICATION AND SOME CONFUSION THE PAX DISAPPEARED FROM THE TKT X-RAY AREA AND DID NOT BOARD THE FLT. THIS INITIATED A BAG FULL FOR THE OTHER CHECKED BAG. AS RAMP PERSONNEL WERE UNABLE TO LOCATE THE BAG THE A/C WAS PERMITTED TO PROCEED WITH CAPTAIN'S ASSURANCE THAT THE BAG WOULD BE RETURNED FROM PAP ASAP.

J HEH 090479

17MAR1999

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
961	03/21/99	CLO	1655	1702	7	AD	E31	1579

Conx Time	# Conx Psgrs	# Conx Bags	# Large Party

RMOD Contact	Time Contact
6265	A35

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
YES	<u>Yes</u> /No	N/A J/B: 7	N/A J/B: 1600	N/A J/B: 1650

Positive Find?	How Much?	Message Sent? Yes/No Attach

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
934	GYE	1537	1534	N/A	N/A	E31	175

U.S. CTMS PROFILED FLT 961 CLO //RANDOM PAXS// SEC AND OPS WERE ADV'D AT 1433....

THE INBOUND FLT 934 GYE WAS CLRD AT 1601 AT THE SAME TIME CABIN SVC BEGUN THE CLEANING OF THE A/C; THAT PROCESS LASTED UNTIL 1628...U.S. CTMS WAS INQUIRING ABOUT PAX MURIEL/J XFER FROM FLT 1579 EWR; HIS FOUR BAGS WERE RETRIEVED AT 1639 PLANE SIDE BEFORE LOADED. THE PAXS BOARD WAS SMOOTH UNTIL TWO WHCHR PAXS LEDESMA/JUTH AND PEIR XFER FROM FLT 1731 IN AT 1422 ARRIVED AT THE GATE AT 1643//WHEN THE REG PAXS WERE BOARDING//IN ADDITION AN AILE CHAIR WAS RQST'D FORMING A JAM AT THE ENTRANCE OF THE A/C...AT 1650 THE LAST PAX BOARDED, BUT, DUE TO THE FACT THAT MOST OF THE PAXS WERE CARRYING HEAVY AND OVERSIZE CARRY-ON THE NUMBER ONE F/A REFUSE TO CLOSE THE DOOR UNTIL ALL PAXS WERE SITTING... AT 1658 ONE OVERSIZE BAG AND BABY STROLLER WAS GATE CHKD DUE TO NO SPACE AVAILBLE IN THE PAX CABIN...A 1704 THE FWD BELLY HAD TO BE REOPEN TO LOAD THE TWO PCS...

Were bags sent to Carousel #8 for CET inspection?:

FL 961/21MAR MIA HM
FL 961/21MAR MIA DM ACFT 522

21 2244 810904 MIA-7X2
OMM(ADF 961/21 MIA 1/40
CET MONITORING DEPARTURE. CUSTOMS CALLED OFF
BRIDGE AT 1635, HOWEVER JETBRIDGE WAS BACKED UP
AND LOADING IMPACTED AS RESULT

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
961	4/4/79	C10	1655	1700	05	041	07	184

Conn Time	# Conn Psgrs	# Conn Bags	# Large Party
/	/	/	/

RMOB Contact	Time Contact
GREGG	1626

Time CET Advised:	Random Search	Nbr CET Officers Ramp	Time CET ON Ramp	Time CET OFF Ramp
N/A	Yes/No	J/B: 6	J/B: 1626	J/B: 1705

Positive Find?	How Much?	Message Spt? Yes/No Attach
/	/	/

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
1981	LGW	1537	1516	/	/	07	184

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors	Nbr Cust Inspectors
/	/	/	/	/	/	/

U.S. CTMS/CET TEAM/PROFILED FLT 961 C10/RANDOM PAXS//
AT 1620 THE FIRST PAX WAS BOARDED. AT 1626 CET/CET TEAM
ARRIVED AT THE GATE AND REQUESTED TO SLOW DOWN THE PROCESS
AT 1631 PAX OSDRIO/ESMERALDA WAS PROFILED, AFTER ROUTINE
QUESTIONS, AT 1635 CET TEAM DECIDED FOR HAND CHECK SEARCH
AND USD CURRENCY WAS DISCOVERED TAPED AROUND HER BODY.
AT 1651 HER THREE BAGS WERE REQUESTED AND AT 1700 ALL BAGS
WERE RETRIEVED.

Sela Chen

FL 961/04APR MIA DM
FL 961/04APR MIA DM ACFT SDJ

04 2141 8E0904 MIA-7X2
DM961/4 MIA 5/41
CET ACTIVITIES

Were bags sent to Carousel #8 for CET inspection?:

Were there piggybacking issues on Carousel #8 for this flight?:

Are you aware of any Carousel changes for this flight in Customs?:

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 (727) MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
423	07/31	SDQ	1855	1925	46	04A	D18	131

Conn Time	# Conn Psgs	# Conn Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
D-PLANNER (NOTE)	1800

Time CET Advised:	Random Search	Nbr CET Officers Ramp	Time CET ON Ramp	Time CET OFF Ramp
/	Yes/No	J/B: 5	J/B:	1800 J/B: 1800

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

US CUSTOMS PROFILED FLT 423 SDQ /PAXS AND BAGS/. FIRST PAX BOARDED AT 1829. AT 1845 DSH ADVI SEC THAT THE FLT WAS HOLDING TO CNCT PAXS OF FLT 1397 JFK IN AT 1845 D-17. LAST PAX PRESENT AT THE GATE BOARDED AT 1849 AFTER THAT, EVENTHOUGH SEC SUP ASKED TO CLOSE THE DOOR THEY WOULD NOT DO IT. RAMP SIDE THE AFT BELLY WAS CLOSED AT 1847, BUT THE FWD BELLY REMAINED OPEN WAITING FOR THE CNCTG BAGS NOTHING WAS LOADED FROM 1847 UNTIL 1907, WHEN 10 BAGS WERE RCVD AND AT 1908 FIVE MORE BAGS, ALL FROM THE SAME FLT.

A GROUP OF 10 PAXS OF FLT 1397 JFK REACHED THE GATE AT 1900.

OPS PLANNER WAS ADVI THAT AS LONG AS BAGS ARE REACHING THE GATE, IT WILL X-RAYED. BUT XFER SUPPORT WOULD SAID THAT US. CUSTOMS WERE HOLDING THE PROCESS SEC PLANNER ASKED OPS TO POINT THE CAMERA TO GATE. SEC ISC CALL OPS PLANNER NATE AND EXPLAINED HIM OF THE SITUATION BUT HE SAID THAT THE RMOD J/TIMMERMAN WILL MAKE THE DECISION.

[Handwritten Signature]

FL423/31JUL MIA DM
FL423/31JUL MIA DM ACFT 721

31 2315 9C08AF MIA-E9H
DM423/31 MIA 14/04D USC UP & DOWN CHKG FLIGHT

END HISTORY

What is this about pointing the camera at the gate?

Di 2 - nos
FX Band

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 (757) 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
2160	6/11	LAX	13:20	13:27	7	Ø4D	D-20	150

Connx Time	# Connx Psgrs	# Connx Bags	# Large Party
—	—	—	—

RMOD Contact	Time Contact
—	—

Time CET Advised:	Random Search	Nbr CET Officers	Time CET ON	Time CET OFF
	Yes/No	Ramp: 2 J/B: —	Ramp: 12:33 J/B: —	Ramp: 13:07 J/B: —

Positive Find ?	How Much ?	Message Sent ?
No	—	Yes/No Attach

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors

Nbr Cust Inspectors

Time CET Advised:	Random Search	Nbr CET Officers	Time CET ON	Time CET OFF
	Yes/No	Ramp: J/B:	Ramp: J/B:	Ramp: J/B:

Positive Find ?	How Much ?	Message Sent ?
		Yes/No Attach

Customs X-Raying bags Rampside - Blocked fuelers from fueling aircraft

The statement from the security driver: "The X-ray truck was blocking the fuel truck. They are X-RAYING bags by customs, checking by X-RAYS at 12:33. They finish at 13:07. A total of 6 cans sent to customs."

Security driver asks customs to move their truck so the fuelers can get in and fuel the aircraft. Customs started to "hold on", just a few more. After approx 5-6 mins, they moved their truck.

Were bags sent to Carousel #8 for CET Inspection?: —

Were there piggybacking issues on Carousel #8 for this flight?: —

Are you aware of any Carousel changes for this flight in Customs?: —

**AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT**

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10 **737**
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
027	3-12-01	GUA	115	115	41	070	06	128

Conx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
FEAR	0935

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
0935	Yes/No	J/B: 5	Ramp: 1109 J/B: 1100	Ramp: 1140 J/B: 1140

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
Yes	177Ax	Yes/No Attach

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors

Nbr Cust Inspectors

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
	Yes/No	J/B:	J/B:	J/B:

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach

DURING ROUTINE PAX INTERVIEWING PAX OVALLE WAS FOUND TO HAVE IN EXCESS OF FOURTEEN THOUSAND US. CUSTOMS REQUESTED BAG PULL AT 1104 RESENTED REQUEST AT 1107 AND REINSTATED SAME AT 1109. AT 1140 AFTER BOTH CARGO HOLDS WERE SEARCHED AND THE BAGS NOT FOUND THE A/C WAS PERMITTED TO DEPART. DELAY OF 41 MINS 04D.

OFFICE HEB ISC MIA

Were there piggybacking issues on Carousel #8 for this flight?:

Are you aware of any Carousel changes for this flight in Customs?:

Airline & Flight#	VC 6001	AA 1735		
ETD	1115	1330		
Location	CCS	KJ		
Flight Type: (Circle)	Bolo- Ops -Target	Bolo- Ops -Target	Bolo- Ops-Target	Bolo- Ops- Target
Bolo Worked ?	Yes - No	Yes - No	Yes - No	Yes - No
Bolo Results ? (Circle)	Positive - Negative	Positive - Negative	Positive - Negative	Positive - Negative
Time Notified Airline	1030	1230		
Person Notified	AGGOT	AGGOT		
Time Inspector At Gate	1030	1230		
Actual Departure	1120	1350		
Delay: If "Yes" state reason below	Yes - No	Yes - No	Yes - No	Yes - No
# Locals Working	01	01 -		
Time Boarding Started	1100	1255		
# Pax on Flight	52	165		
Time Last Pax Boarded	1115	1327		
Last Pax Stopped ?	Yes No	Yes - No	Yes - No	Yes - No
Total # Pax Stopped	02	5		
# Pax Exams - CP503's	01	2		
Time Completed Pax Processing	1110	1320		
Baggage Exam Start Time	1045	1252		
Type of Examination and Total # of Bags Examined	Opened <u>07</u> X-Rayed <u>92</u> K-9 <u>-</u>	Opened <u>21</u> X-Rayed <u>283</u> K-9 <u>-</u>	Opened _____ X-Rayed _____ K-9 _____	Opened _____ X-Rayed _____ K-9 _____
Total Bags on Flight	92	273		
Last Bag Presented		1346		
Time Completed Baggage Processing		1349		
Number of Forced 4790's and Total Amount	# _____ \$ _____	# _____ \$ _____	# _____ \$ _____	# _____ \$ _____
Seizure(s) this Flight	Yes - No	Yes - No	Yes - No	Yes -

Comments: See attached list for AA 1735 Inpo

**AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT**

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
A35	08-10-00	Kin	1330	1350	20	04D	E8	

Connx Time	# Connx Rsgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
	Yes/No	J/B:	J/B:	J/B:

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
/	/	/

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
/	/	/	/	/	/	/	/

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors
/	/	/	/	/	/

Nbr Cust Inspectors
/

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
	Yes/No	J/B:	J/B:	J/B:

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
/	/	/

US. CUSTOMS PROFILED FLT 1735 KIN E-8 ETD 1330. PAXS WERE RANDOMLY SCREENED IN THE JETBRIDGE AND BAGS WERE X-RAYED RAMP SIDE. MOST OF THE BAGS WERE AT THE GATE ON TIME OR EARLIER, US. CUSTOMS ARRIVED AT THE GATE AT 1235, AT 1250 ONE X-RAY SET-UP IN THE FWD BELLY, AND THE FIRST BAG LOADED AT 1255. /ONE CART/ UNTIL 1258, AFTER THAT THE PROCESS WAS CEASED, DUE TO THE X-RAY NEEDED TO BE MOVED TO THE AFT BELLY AS A RESULT OF THE SECOND X-RAYED MORIL THAT ARRIVED AT 1252 WENT OUT OF SERVICE. NOT ONLY, US. CUSTOMS CEASED THE PROCESS, THE BAGS FOR THE FWD BELLY WERE HELD UNTIL THE MACHINE WAS WARMED UP/IT NEVER HAPPENED/, AFTER 17 MINS THAT THE X-RAY WAS INOPERATIVE THE FIRST BAG, FINALLY, WAS LOADED /IT WAS AT 1315/, AND THE LAST BAG LOADED 1336. IN THE AFT BELLY THE LAST BAG LOADED AT 1347.

FL1735/10AUG MIA DM
FL1735/10AUG MIA DM ACFT 5BU

10 1755 8E0904 MIA-5JT
DM1735/10 MIA 20/04D
CET TEAM XRAY

END HISTORY.

Carl Hagan
526-5885
871-2908

Air Jan.
526-2000
#2516

AIRPORT DELAYS
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 **(727)** MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
423	07/31	SDR	1855	1925	VI	040	D18	131

Connx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
D- DIAMER (NOTE)	1800

Time CET Advised:	Random Search	Nbr CET Officers Ramp	Time CET ON Ramp	Time CET OFF Ramp
/	Yes/No	J/B: 5	J/B:	Ramp: 1800 J/B: 1800

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

US. CUSTOMS PROFILED FLT 423 STD /PAXS AND BAGS/.
FIRST PAX BOARDED AT 1829. AT 1845 CSM ADVI SEC THAT THE FLT WAS HOLDING TO CNCT PAXS OF FLT 1397 JFK IN AT 1845 D-17, LAST PAX PRESENT AT THE GATE BOARDED AT 1849 AFTER THAT, EVENTHOUGH SEC SUP ASKED TO CLOSE THE DOOR THEY WOULD NOT DO IT. RAMP SIDE THE AFT BELLY WAS CLOSED AT 1847, BUT THE FWD BELLY REMAINED OPEN WAITING FOR THE CNCTG BAGS NOTHING WAS LOADED FROM 1847 UNTIL 1907, WHEN 10 BAGS WERE RCVD AND AT 1908 FIVE MORE BAGS, ALL FROM THE SAME FLT.

A GROUP OF 10 PAXS OF FLT 1397 JFK REACHED THE GATE AT 1900.

DPS PLANNER WAS ADVI THAT AS LONG AS BAGS ARE REACHING THE GATE, IT WILL X-RAYED. BUT XFER SUPPORT WOULD SAID THAT US. CUSTOMS WERE HOLDING THE PROCESS SEC PLANNER ASKED DPS TO POINT THE CAMERA TO GATE. SEC ISC CALL DPS PLANNER NATE AND EXPLAINED HIM OF THE SITUATION BUT HE SAID THAT THE RMOD J/TIMHERMAN WILL MAKE THE DECISION.

[Handwritten Signature]

FL423/31JUL MIA IM
FL423/31JUL MIA IM ACFT 721

31 2315 9C08AF MIA-E9H
DM423/31 MIA 14/04D USC UP & DOWN CHKG FLIGHT

END HISTORY

What is this about pointing the camera at the gate?

**AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT**

OUTBOUND FLIGHT:

AIRCRAFT TYPE:
(Circle one)

A300 757 727 MD11 S80 D10

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
931	07-20-00	LITD	1910	1919	09	84D	D4	157

Connx Time	* Connx Rsgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
Greg	1831

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	8 J/B: 0	1830 J/B: 1830	1915 J/B: 1910

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
/	/	/

INBOUND FLIGHT:

AIRCRAFT TYPE:
(Circle one)

A300 757 727 MD11 S80 D10

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
/	/	/	/	/	/	/	/

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors
/	/	/	/	/	/

Nbr Cust Inspectors
/

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B:	J/B:	J/B:

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
/	/	/

*Get to ramp preflight 1931 LITD. PAXS AND BAGS
at 1830 get baggage to X-ray. bags on both belts.
per crew there needed 8 ramp clerks to load bags
and only had 6. At 1910 3 bags had to be open
due to that worked a 9 minute delay.*

FL931/20 MIA DM
FL931/20 MIA DM ACFT 50J

20 2349 8E0902 MIA-SJU
DM931/20 MIA 9/04D
CUSTOMS CHECKING BOTH
PAXS AND BAGS!

got arrived @ 1815
 + up 2 X-Rays @ 1820
 began X-raying rear belly @ 1823
 pushed 1st cart @ 1835
 rayed front + back simultaneously.
 added bags on front belly ourselves
 due to low manpower
 - Loaded Mail on rear belly til 1908
 Began 2nd Last bag cart @ 1909
 Began Last cart @
 * Finished front belly @ 1911
 Finished + pulled off rear belly @ 1917
 Pushed out @ 1925

Notes - CPS03's

Time Completed Pax Processing	2111			
Baggage Exam Start Time	2080			
Type of Examination and Total # of Bags Examined	Opened <u>20</u> X-Rayed <u>253</u> K-9 _____	Opened _____ X-Rayed _____ K-9 _____	Opened _____ X-Rayed _____ K-9 _____	Opened _____ X-Rayed _____ K-9 _____
Total Bags on Flight	253			
Last Bag Presented	2120			
Time Completed Baggage Processing	2122			
Number of Forced 4790's and Total Amount	# _____ \$ _____	# _____ \$ _____	# _____ \$ _____	# _____ \$ _____
Seizure(s) this Flight	Yes - No	Yes - No	Yes - No	Yes - No

Comments: _____

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
967	10-26-00	U10	1705	1727	22	04D	D4	164

Conx Time	# Connx Psgrs	# Connx -Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact

Time CET Advised:	Random Search	Nbr CET Officers	Time CET ON	Time CET OFF
	Yes/No	Ramp: 02 J/B: 05	Ramp: 1600 J/B: 1600	Ramp: 1725 J/B: 1712

Positive Find ?	How Much ?	Message Sent ?
No	/	Yes/No Attach

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
/	/	/	/	/	/	/	/

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors	Nbr Cust Inspectors
/	/	/	/	/	/	/

Time CET Advised:	Random Search	Nbr CET Officers	Time CET ON	Time CET OFF
/	Yes/No	Ramp: J/B:	Ramp: J/B:	Ramp: J/B:

Positive Find ?	How Much ?	Message Sent ?
/	/	Yes/No Attach

MIAQFAA
MIAQFAA 262250 256620 MIA/H20

C.E.T. PROFILED BAGS AND PASSENGERS ON THIS FLIGHT. THE DELAY HAPPENED AT THE RAMP AS THERE WAS ONLY ONE VAN X-RAYING AND TWO C.E.T OFFICERS FOR APPROX. 209 BAGS. THE X-RAYING/LOADING STARTED AT 1623 AT THE AFT. BELLY. AT 1640 WE ASKED CET IF WE COULD START LOADING THE FORWARD BELLY AND THEY GAVE US A NEGATIVE ANSWER. AT 1700 THEY AUTHORIZE THE CREW TO LOAD THE FORWARD WITHOUT XRAYING. THIS SITUATION CREATED A 22 MINUTE DELAY. THE AFT. BELLY CLOSED AT 1700 AND THE FORWARD AT 1725.
END OF REPORT
LUZ M DIAZ/INTL. SECURITY

26OCT2252
P001631-MIAAAA 6010

Were there plggybacking issues on Carousel #8 for this flight?:

Are you aware of any Carousel changes for this flight in Customs?:

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
967	9-12-00	V10	17:05	17:40	35	04D	E7	165

#Connx Time	#Connx Pags	#Connx Bags	#Large Party
/	/	/	/

RMOD Contact	Time Contact
NO	NO

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
N/A	Yes/No	0 J/B: 1	N/A J/B: N/A	17:40 J/B: 17:30

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
NO	N/A	

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
/	/	/	/	/	/	/	/

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors

Nbr Cust Inspectors

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B:	J/B:	J/B:

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
/	/	/

MIAQFAA
MIAQFAA 122327 256A20 MIA/H20

DELAY FLIGHT 967 ETD 1705 A/C NBR 5BT
AT APPROX. 1705 EMIL WAS ADVISED BY PLANNER OF C.E.T.
ACTIVITY AT GATE E7 THIS WAS ALREADY DEPARTURE TIME OF
FLT. IMMEDIATELY BOTH EMIL AND LUZ WENT TO THE GATE FINDING
OUT THAT CET HAD POSTD A BAG PULL TO C.S.M. OF FLT.
ONCE AT THE RAMP CREWCHIEF INFORMED US THAT IT WILL TAKE

THEM ANOTHER 20 MINUTES TO LOCATE BAGS WE INFORMED C.E.T.
WHEN THEY HEARD THIS THEY ASKED US TO FORGET ABOUT THE
THE BAGS AND THIS WAS AT 1727

12SEP2328
FO01431-MIAAA 1759
DELATIALS

NW QM

American Airlines issues raised during town hall meeting in Miami.

ISSUE:

Recently the Commissioner held a Town Hall meeting for Customs personnel in Miami, Florida. Among the issues raised by the Customs employees present, there were four with regard to American Airlines. They are as follows:

- U.S. Customs in Miami gives American Airlines preferential treatment.
- Customs personnel must have an American Airline Mechanic accompany them when performing an aircraft search.
- U.S. Customs gives American Airlines a one hour notice prior to performing an outbound examination of a departing flight.
- Customs personnel must remove the X-Ray van five minutes prior to departure time of an American Airlines flight.

FINDINGS:

The Miami office was contacted regarding the above issues and were asked to comment accordingly. The following reflect the answers compiled by the Acting Airport Director, Airport CET Chief, and Outbound Enforcement Chief.

- **U.S. Customs in Miami gives American Airlines preferential treatment**

Initial data does not indicate that American Airlines receives any preferential consideration.

There are two charts that were compiled depicting the number of American Airlines planes that were searched in comparison to other airlines.

One chart depicts the flights searched by CET and what percentage of CET searches an Airline receives. American Airlines counts for 13.53% of CET searches. (SEE ATTACHED)

The other chart looks at (for the month of Jan only), total international arrivals by airline and shows the percentage of CET searches. 6.48% of American flights were examined. (SEE ATTACHED)

To get an exact picture of American in comparison to other Airlines, one would have to factor in the country of origination for each flight, the risk factor of each country, how the risk was

ored in when selecting flights to search, and any other variable that goes into selecting lines for examination. At this time the port was not asked to perform this analysis.

- **Customs personnel must have an American Airline Mechanic accompany them when performing an aircraft search.**

Since 1/98 this has not been the policy in Miami.

Chronology -AA Aircraft Search/Mechanics Issue

May 9, 1997

While searching an AA aircraft, a CET inspector opened a speaker panel in the ceiling of the lavatory. This accesses an area where drugs have been found in the past. When she took out the first of four screws, the panel fell to the floor, which tore the speaker wires. She immediately located AA personnel at the jet bridge and advised them of the damage. The repair of this panel caused a 22 minute delay in the departure of that aircraft.

- ▲ That same date, on another AA aircraft, there was a material failure on a/c door latch which they assumed Customs had done, but Customs inspectors indicate they had not; to their knowledge, damaged any door latch.
- ▲ On a third aircraft, the same date, there was damage to the right emergency exit oxygen panel. It appeared to have been torn out and thrown on the ground; all wires behind the panel were pulled. Customs shift reports indicated that CET did not work that flight. Customs was told by AA that a CEO and dog went onboard alone. Despite our questioning, we were never able to determine whether this was true. Other factors which made this allegation questionable were that Customs CEO's do not search planes individually, and all Miami CET officers are trained to immediately report any damage resulting from their activities. Reporting damage is routine for CET inspectors.

Customs did learn that a number of the "security mechanics", whose job it was to support CET when needed, had been given notice that they were to be laid off. As a result of the above incidents, all those who were to be laid off were retained by AA's to open all panels CET wished to open.

(It was the policy of AA that all damage to an aircraft be reported directly to Mr. Crandell, the CEO. Subsequently there was a meeting of AA management with its Chief Pilot, and Art Torneau, VP in Charge of Miami operations. Mr. Torneau decided he did not want any aircraft touched by Customs. He believed that

because we did not possess FAA mechanics' certificates, we were violating FAA regs every time we opened a panel. He decided to make mechanics available to open panels when requested by USC, and conveyed his concerns to the CMC.)

A decision was made locally to use the mechanics to open panels and discontinue the opening of panels by CET personnel. Shortly after this new policy was initiated, the aircraft search/mechanic issue was brought to the SPS. Counsel was enlisted to explore the legality issues, and a subgroup of inspectors and AA mechanics was formed to work out issues of narcotics concealment areas on the various aircraft and report to the larger SPS group. A legal opinion of the search authority was sought from and drafted by Associate Chief counsel. It was received in November, 1997, and the new search procedures, in which CET opens panels, then advises AA mechanics as to what panels are open so they may secure them was implemented in January, 1998.

Port management closely monitored this procedure for some time. There have been no issues, conflicts or questions in this area for many months.

- U.S. Customs gives American Airlines a one hour notice prior to performing an outbound examination of a departing flight.

Local Policy. Not in writing. Oral instructions to employees.

On or about 1991, in a Carrier Initiative workout session with AA, a suggestion was made for Customs to give AA an hour notice when Customs wanted to examine a flight. This would allow AA to make arrangements to get more resources to that flight, thus expediting/mitigating the impact. AA has come to feel this is their right and that we are in violation of policy if they don't get the notice. Customs Supervisors report that instead of sending resources to expedite the flight, AA now sends one person with a clipboard who stands there, takes notes and continually harangues the Customs personnel with comments about calling HQ's and the CMC.

The Port is being instructed to reevaluate this position and create a policy that is consistent with all airlines.

It is understood why this advance notification agreement was implemented, and how it is not consistent with the national Outbound policy. Also, by having this one hour notification in place it may possibly compromise Customs' enforcement posture. Therefore, in order to be consistent with national policies, advance notifications to all airlines will be discontinued.

- Customs personnel must remove the X-Ray van five minutes prior to departure time of an American Airlines flight.

3 hrs for
AA
1 hr other
Colombian
BASIS FL

The following procedures are to be followed prior to conducting a currency interdiction operation involving passengers, crew and carry-on luggage. These procedures will assist in successful prosecution, and forfeiture of unreported currency or monetary instruments.

1. Determine which areas of the airport will be covered:

a. Check-in counter—Offers an excellent vantage point to pre-screen passengers as they check their luggage and obtain boarding passes.

At this location the Customs officer can determine which passengers are traveling together, who dropped suspects off at the airport, demeanor of passengers, and other targeting techniques similar to those used during inbound processing.

Suspicious persons should be identified to Customs officers stationed at the security checkpoint and jetway.

b. Security checkpoint—The Customs officer at security monitors the X-ray images as passengers proceed through the metal detector.

Suspicious persons or hand carried luggage should be identified to Customs officers in the departure lounge or jetway.

It is important to note an accurate description of the item as well as the person. The item may be given to another passenger in the departure lounge, especially if the suspect realizes that Customs officers are conducting currency interdiction operations.

c. Departure lounge—Customs officers in the departure lounge identify high risk passengers. Officers also note passengers who depart the area when the announcements are made and/or currency interdiction operations begin.

d. Jetway leading to aircraft—This is generally considered the last point of departure for purposes of filing the CF 4790. Officers here will conduct the title 31 stops and interviews. If other officers are deployed elsewhere (check-in, security, baggage, lounge) they should converge on the jetway at boarding time to assist in interviews.

2. Notify the airline of intent:

a. Advise an airline supervisor that Customs intends to perform an outbound inspection of a particular flight. The passengers are not to be informed unless currency interdiction team leaders/OI, in consultation with the local U.S. Attorney, determine that there is a need to announce currency reporting requirements over the public address system before initiating any inspections.

Handwritten signature/initials

Local Policy. Not in writing. Oral instructions to employees.

Awaiting further details from the port.

The port is being instructed to reevaluate this position and create a policy that is consistent with all airlines.

While this policy is not contradictory to Outbound's mission it may lend itself to internal conspiracies. Miami Outbound Team's SOP. will be reviewed and modified, as necessary, to ensure that Outbound Supervisors are held accountable in deciding when and if equipment/ personnel are pulled off a flight to avoid flight delays.

The following sequence of events occurred on Saturday 05, 1996 while doing an examination of the baggage and passengers on American Airlines flight number 277 destined to Port Au Prince. Operations was informed at 1130 on 100496 by Chief Norwood and SI Pinkus that this flight was selected for examination.

0630 Outbound team arrived at American Airlines baggage pit, Pier 15. The crew chief was asked which way would be easier for us to inspect the baggage, using our mobil x-ray or using their fixed x-ray. Crew Chief stated that baggage personnel were not informed of the customs examination.

0645 The mobil x-ray was chosen and the Outbound Team started x-raying baggage.

0720 Security showed up at Pier 15 and told SI Pinkus that they were just informed from Operations that we were doing the flight.

0730 The baggage personnel stopped bringing luggage between 0730 and 0750 due to heavy rain.

0750 X-raying of baggage resumed.

0815 Baggage closed at ticket counter.

0815 Six oversize baggage carts were brought over for x-raying and at that time sent to the American Airlines x-ray machine with one of the customs inspectors so we could finish x-raying in time. Two American employees (volunteered to help) assisted the customs inspector to finish the six cans of baggage because no personnel were at that location to help.

0830 Additional bags arrived to be x-rayed and taken to the plane.

0850 Supervisor Greg Garcia went to the ITI x-ray and became very upset with the American personnel and the customs inspector. He wanted to know why ITI was not informed about the x-raying of bags, why customs was there and said he got a phone call reprimanding him for not having his people in place. Now he was going to chew on someone to protect himself. SI Pinkus asked the inspector at the x-ray to please ask that supervisor to come over to Pier 15. Upon Mr. Garcia arriving at that location, SI Pinkus ask him why he yelled at the customs inspector. Mr. Garcia stated that it was not customs problem, but an internal one, then apologize if he had acted unprofessionally.

We would like to extend our thanks and a "WELL DONE" to the Crew Chief, Alfredo, Caesar and the other three baggage persons (my apologizes for not obtaining their names) that worked through their break to assure customs got the examination complete.

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50

ATTACHMENT: SENIOR INSPECTOR EILEEN DE SANTO
SSN 097-42-3648

Senior Inspector Eileen De Santo is assigned to Passenger Processing at Miami International Airport. Since Inspector De Santo has arrived she has proven to be a true asset to this organization. She has made 6 seizures in the past 6 months. She has immersed herself in the secondary area and has, most importantly, assisted other inspectors in discovering contraband, and affecting seizures.

There were at least 6 occasions that I personally witnessed, where Inspector De Santo unselfishly gave her time to assist another inspector in the detection of the contraband and the processing of a seizure. She has adopted the attitude of a trainer of other inspectors and is probably responsible for the large number of seizures being made by novice inspectors during the last few months. She cares about what she is doing and everyday, it is evident that she is showing up to put in a day's work. There have many days where I have had nothing but Summer Temporary personnel and relatively new inspectors straight from graduation from FLETC. Inspector DeSanto was the only experienced person that was available and she has consistently responded in a very positive way. She has shown to be very cooperative with me and has shown how to do the job to numerous inspectors.

She is a strong believer in enforcing the law and if she feels that something is amiss she will pursue the issue with vigor. There was one occasion where a passenger came to her in secondary and she found that he was an American Airlines employee arriving from Columbia on an Avianca flight. He also had an attitude. Inspector promptly gathered all the information, made contact with AA management personnel, kept me informed and put this information in the computer. Since that time, we have seen the same scenario being played with other American Airlines employees and have started the beginnings of an investigation for conspiracy. This would not have happened if Inspector De Santo had not taken the initiative. She has done this on several occasions.

Since Inspector De Santo arrived in Passenger Operations, she has proven to be a valuable asset. She has been cooperative, has shown a desire to work hard, and has been willing to assist others. For these reasons, I recommend that Senior Inspector De Santo be awarded 3 shares.

SETTLEMENT AND LAST CHANCE AGREEMENT

In the interest of resolving the proposed removal of Ms. Eileen DeSanto (employee) from the Customs Service, the undersigned parties hereby agree to the terms of this Settlement and Last Chance Agreement in lieu of a decision on the proposal as follows:

1. This Settlement and Last Chance Agreement ("Agreement") pertains to the Agency's February 11, 2000, letter proposing to remove Ms. DeSanto from her position as Customs Inspector, Office of Field Operations, Miami International Airport, Miami, Florida. A copy of the proposal letter is attached. The Agreement remains in effect for a period of ~~three~~ years from the date that the Agreement is executed by all parties.
2. The employee admits that she engaged in the misconduct described in the Agency's February 11, 2000, proposal letter and agrees that the employee will serve a thirty-day suspension to be effective without challenge.
3. The Employee agrees to immediately contact the Customs Employee Assistance Program (EAP) and accept the referral and agrees to actively participate in the EAP within 24 hours by:

a) Scheduling and keeping all appointments required by the EAP, (b) providing intake assessment and information to the EAP counselor, (c) following the EAP counselor's recommendations, (d) accepting referral for evaluation and/or treatment, when indicated, and (e) remaining a voluntary and active participant in the EAP throughout treatment and follow-up, until such time as is mutually agreed upon by the EAP Counselor and the treatment provider(s).

4. The Employee agrees to sign specific Release of Information Forms for the Employee Assistance Program counselor and treatment provider(s) so they can share with U.S. Customs Service management information regarding treatment attendance and progress. Did this for Release of Information Form

5. The employee agrees to continue to follow the treatment plan prescribed by a recognized substance abuse treatment program, including participating in an alcohol testing program if required to do so, and provide written progress reports from that care provider to her supervisor on a monthly basis, until such time as a recognized medical authority from that treatment program determines that such treatment is no longer necessary to assure the employee's freedom from substance dependency. Ms. DeSanto will sign the required release of information form to permit the reports to be submitted to her supervisor. EAP

CANNOT BE
FROM ALL THE
HAS BEEN AT
SINCE MAY
REFER CENTER
T. J. Pimental

5
Lack of active EAP participation (i.e., refusal to acknowledge the problem(s), not adequately working toward resolving the problem(s), declining appropriate referral for treatment, refusing to sign the release of information forms, and failure to make and keep appointments), will result in the EAP case being closed. EAP will report the noncompliance and failure to adhere to the "Last Chance Agreement" to Chief Inspector Mary Meier or Port Director Thomas S. Winkowski.

6
Within 30 days of signing this agreement, the employee agrees to undergo a "Fitness for Duty" medical examination to determine whether she is able to perform assigned duties safely and efficiently. The agency will identify the appropriate physician(s) and will pay for the examination(s). If the employee is found unfit for duty by the fitness for duty examination, it will be considered as a breach of the Last Chance Agreement, and she will be terminated in accordance with paragraph 10 below.

8
In further consideration of the agency's placing in abeyance its decision on the proposed removal, Eileen DeSanto agrees to withdraw all pending EEO complaints filed against the agency, whether formal or informal, that exist as of the date Ms. DeSanto signs this agreement. This includes the withdrawal of T.D. Case No. 98-2273 and T.D. Case No. 99-2186T, including the hearings that Ms. DeSanto has requested before an EEOC Administrative Judge in EEOC Case No. 150-99-8358X and EEOC Case No. 150-99-8830X. This also includes the withdrawal of T.D. Case No. 00-2204. This further includes any other EEO complaints not specifically referenced. Ms. DeSanto agrees that her signature on this agreement effects the withdrawal of her EEO complaints and requests for hearings, and that the agency may send a copy of this agreement to the EEOC as proof thereof. Ms. DeSanto agrees that the withdrawal of her EEO complaints is voluntary, without duress or coercion.

9
The Customs Service will hold in abeyance its decision on the proposal to remove Ms. Eileen DeSanto from the Customs Service (as set forth in paragraph 1), for a period of two years.

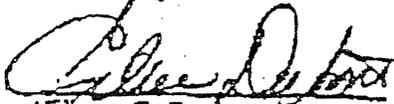
10
Non-Compliance and Termination- If the employee engages in further misconduct or fails to comply with the terms set forth in items 2 through 9 of this Agreement, the parties agree that such conduct, and/or failure to comply will result in immediate termination of the employee's employment with the U.S. Customs Service.

11
If the employee is terminated or removed pursuant to provisions of the agreement because of any violation of its terms, it is understood that all of the employee's statutory and contractual appeal rights, including all grievance and appeal rights to the Merit Systems Protection Board, or pursuant to the National Agreement between the National Treasury Employees Union and the U.S. Customs Service

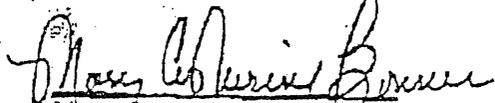
relative to termination for the reasons set forth in the proposed removal letter dated February 11, 2000, are hereby waived.

1.0

- 12. All parties enter into this Agreement freely and voluntarily, without threats or coercion of any kind.
- 13. Each party will bear its own attorney fees and costs, if any, in connection with this matter.
- 14. This settlement represents the entire agreement between the parties. The parties acknowledge that the terms and conditions of this Agreement are understood and fully acceptable.
- 15. This Agreement has been reviewed by the parties and the terms and conditions are understood and acceptable to all parties.
- 16. The terms of this Agreement shall be kept confidential by the parties and will not be communicated to others, except to those who have a need to know, in the conduct of their official business; in order to effect the terms of this Agreement or to address claims raised with non-compliance or future disciplinary actions, in accordance with applicable regulations and statutes.
- 17. Effective date - The effective date of this Agreement is the date on which all signatories below have signed.


Eileen DeSanto

10/19/00
Date


Mary Catherine Bonner
ATTORNEY AT LAW

10/19/00
Date


Thomas S. Winkowski
Acting Director
CMC, South Florida

10-13-2000
Date

Author: SANDRA E WISOTSKY at PORT-MIAMI_CCC-1_PO
Date: 7/5/00 11:14 PM
Priority: Normal
TO: CHESTER W OLEJASZ
CC: ALEXIS COLEMAN, RUBEN NMI GONZALEZ
Subject: American Airlines Flight #1901 - Santo Domingo

----- Message Contents -----

FYI

Outbound Currency Task Force target AA 1901 to Santo Domingo. alerted to PAX Gladys Rodriguez at approximately 17:00. Domestic travel, tail-to-tail from Anchorage to Dallas to MIA. K-9 Sonya alerted to PAX in jetway. PAX had 5 bag tags. On CF 503, PAX declared \$1,000. Patdown was requested by SI and SCI Wisotsky granted approval. PAX at first refused Patdown. PAX advised she had \$50,000.00, currency on her body. Ultimately a patdown was initiated. PAX was escorted to Outbound office.

Search of the bags by American only turned up 3 bags of the 5. Richard Ramcharitar, AA Customer Service Manager, advised SI Russell, J. that they would bring back the bags from Santo Domingo if they locate them. I spoke with S/A N. Bright and we both felt very strongly that if we left the bags go, we could have a repeat of the previous weeks where we didn't get the bags returned timely. Also we had allowed AA to bring back the Jamaican bags on the seizure two weeks ago, and they failed to do so. I advised the team to keep searching till AA located all 5 bags. AA was having difficulty locating the bags as they could not match bag tags to the bags that were manifested. I contacted AA International Manager, Ric Arner, and advised him what we were told by the AA gate agent "they do not manifest the transit bags and do not know where the bags are located in the aircraft." AA also stated that the Dallas flight came into MIA between noon and 1300 hours. AA does not put the transit number on the log or on the can. Ric Arner advised me that the 2 bags could possibly not be on the Dallas/Ft. Worth flight to MIA, he would not know until the next day when he could trace the routing out of Dallas.

Mr. Alfred Cuyar, AA Managing Director arrived at planeside and also advised me that they do not manifest transit bags. I explained that we are sorry for the delay, however this is serious, as they do not know location of the transit bags or whether the bags are on the flight. I explained that there are times we are trying to locate explosive devices or anti-terrorism targets and this could be detrimental to the safety of 150 to 200 PAX's. He stated he would immediately look into this situation to rectify local bag policy.

The two missing bags could not be located and the flight was approximately one hour delayed. I authorized departure without locating the two bags. AA Richard Ramcharitar advised they would contact us as soon as they located the bags either in Santo Domingo or Dallas.

Sandy

OPERATIONS DELAY REPORT

OUTBOUND FLIGHT:

AIRCRAFT TYPE:
(Circle one)

A300 757 727 MD11 S80 D10

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
961	07/31	C10	1655	1707	12	040	E-9	168

Conn Time	# Conn Psgrs	# Conn Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
E-PINNER	1545

Time CET Advised:	Random Search	Nbr GET Officers Ramp: 4 J/B: 4	Time CET ON Ramp: 1657 J/B: 1600	Time CET OFF Ramp: 1707 J/B: 1707
/	Yes/No			

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

US, CUSTOMS BEGUN X-RAYING BAGS PLANE SIDE AT 1559.....
THERE WERE TWO X-RAY MOBILS AND BOTH BELLIES WERE LOADED
AT THE SAME TIME. EVERYTHING RAN SMOOTHLY, FWD BELLY
CLOSED AT 1650. AT 1646 PAX GOMEZ/O XFR FLT 1977 ORD
IN AT 1610 D-9 WAS PROFILED AND AFTER ROUTINE QUESTIONS, AT
1654, HIS BAG WAS REQUESTED, AT THE SAME TIME US, CUSTOMS
WAS ABOUT TO REMOVE THE X-RAY MOBIL FROM THE AFT BELLY,
THERE WERE NO MORE BAGS AT THE GATE, THE CREW CHIEF WERE
STILL LOOKING FOR THE BAG REQUESTED BUT APPARENTLY IT WAS
NOT MANIFESTED, MEANWHILE, AT 1654 A HALF CART WAS RCVD
WITH 11334 BAGS, THERE WERE RCVD SEVERAL DIFFERENT SINGLE
BAGS FROM DIFFERENT TRIPS, AT 1657 THE BAG REQUESTED BY US,
CUSTOMS WAS RCVD, AND AT 1659 ONE CART FULL OF BAGS FROM
FLT 898 LAX IN. AT 1607 D-15. LAST BAG LOADED AT 1704
AFT BELLY CLOSED AT 1706. DPS BEEN AWD OF ALL AT THE TIME
ALL EVENT OCCURED. PAX GOMEZ/O WAS CARRYING EXCESSIVE
AMOUNT OF USD IN HIS POCKETS.

FL961/31JUL MIA DM
FL961/31JUL MIA DM ACFT SEL

[Handwritten Signature]

31 2116 9C08AF MIA-E9H
DM961/31 MIA 12/04D USC CHKE PSGRS & BAGS UP/DOWN

END HISTORY

DELAY WAS NOT CAUSED BY THE OUTBOUND TEAM
TRANSFER BAGS FROM 898 WERE BROUGHT TO PWD/SIDE
AT 1700, ADD CUSTOMS LEAD BY RUSSELL NOTIFIED SECURITY.
PAX GOMEZ'S BAG WAS ALREADY TAKEN OFF THE AIRCRAFT
AT 1657 ADD NOTIFIED THAT PAX GOMEZ WAS NOT FLYING, EXED
BEFORE THE TRANSFER BAGS WERE BROUGHT TO FLT 961.
DELAY1.XLS 1/13/98

**AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT**

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
1711	06/04/00	SDQ	1100	1107	07	040	D19	162

Connx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
SUZANNE	0956

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
N/A	Yes/No	J/B: 3	J/B: 100	J/B: 100

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
/	/	/

US CUSTOMS /CET TEAM/ PROFILED FLT, 1711 SDQ, PAXS AND BAGS THE FIRST PAX BOARDED AT 1024 THERE WERE TWO CET AGTS AND CRE K-9. SCREENING PAXS IN THE JTBGG, WHILE THE REST OF THE TEAM WERE AT THE BAGROOM X-RAYING BAGS EVERYTHING /PAXS FLOW AND BAGGAGE LOADING/ WAS SMOOTH, UNTIL AT 1051 THE LAST PAX BOARDED AND SEC ASKED TO CLOSE THE DOOR, BUT PAXS SUC WAS STILL WAITING FOR SOME MORE MEALS REQUESTED FEW MINS AGO. MEANTIME, SEC DRIVER ADV THAT US CUSTOMS CEASED X-RAYING BAGS LEAVING THE BAGROOM, AND THERE WERE THREE CTS STILL THERE. AT 1054 THE CTS WERE BROUGHT TO THE GATE AT 1055 THE SAME WERE AT THE GATE AND LOADED, AT 1106 THE LAST CT WAS LOADED AND AT 1107 AFT BELLY CLOSED.

FL1711/04JUN MIA DM
FL1711/04JUN MIA DM ACFT 076

04 1552 9C08AF MIA-F5L
DM 1711/4 MIA 7/04D
CET XRAY IN BAGROOM / UNABLE TO MOVE IN WAVES FROM BAGROOM

END HISTORY

Were bags sent to Carousel #8 for CET inspection?:

Were there piggybacking issues on Carousel #8 for this flight?:

Are you aware of any Carousel changes for this flight in Customs?:

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
961	05-19-00	CLO	1655	1701	6	04D	E5	135

Conn Time	# Conn Psgs	# Conn Bags	# Large Party
/	/	/	/

RMOD Contact *Gregg* Time Contact 1600

Time CET Advised:	Random Search	Nbr CET Officers	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B:	J/B: 1600	J/B: 1701

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

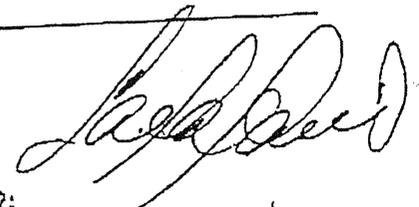
U. S. CUSTOMS //CET TEAM// SCREENING PAXS ON FLT 961 CLO INBOUND FLT 2115 EWR IN AT 1525 AND SEC CLRD AT 1553 AT THAT TIME CABIN SVC WAS NOT PRESENT THE SAME ARRIVED AT 1605, FINISHING AT 1630. THE FIRST PAX BOARDED AT 1631, SEC PLANNER ADV DPS THAT THE BOARDING PROCESS WAS VERY SLOW DUE TO THERE WAS ONLY ONE PLUCKER AND THE SAME WAS SLOW. AT 1648 THERE WAS A PROFILED PAX ON THE JETBRIDGE, ALL PAXS WERE BOARDED ALREADY, AND SEC ADV THE GATE CSM THAT THEY NEED TO CLOSE THE DOOR, BUT AT 1652 THE FLIGHT ATTENDANCE HAD TWO CARRY-ON BAGS THAT COULD NOT BE ABLE TO ACOMODATE ON BOARD, AT 1654 THE GATE AGT WENT TO THE COUNTER TO GET BAGS TAGS, AT 1657 THE CSM BROUGHT THE BAGS TO THE RAMP LOADED IN THE FWD BELLY, AT 1658 ANOTHER BAG WAS GIVEN TO THE GATE AGT. AT THIS TIME MOST OF THE PAXS WERE STILL TRYING TO HAVE A SEAT. AT 1701 THE A/C DOOR WAS CLOSED.

MAY MIA IM ACFT 614

19 2227 9C08AF MIA-EYC
IM961/19 MIA 06/04D CUSTOM CKG DEPARTING PSGRS GOMES/7200 DOLLAR AND CASTRO/6000 DOLLARS ON JETWAY

END HISTORY

- Were bags sent to Carousel #8 for CET Inspection?:
- Were there piggybacking issues on Carousel #8 for this flight?:
- Are you aware of any Carousel changes for this flight in Customs?:



AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: 961 AIRCRAFT TYPE: A300 (757) 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
961	2/25/00	CLO	1650	1749	59	77Q	D14	90

Connx Time	# Connx Psgrs	# Connx Bags	# Large Party

RMOD Contact	Time Contact
GREG	1645

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
N/A	Yes/No	Z J/B: 8	1610 J/B: 1610	1749 J/B: 1705

Positive Find ?	How Much ?	Message Sent ?
YES	EXCESS \$ AMOUNT	Yes/No Attach

INBOUND FLIGHT: _____ AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors	Nbr Cust Inspectors

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:	Positive Find ?	How Much ?	Message Sent ?
							Yes/No

MIAQFAA

MIAQFAA 260012 256A20 MIA/MAR

***** DELAY OF FLT 961 D14 2/25/00 *****

1610. US CUSTOMS ON JET BRIDGE AND RAMP.
 1645. US CUSTOMS REQ BAG PULL FOR TWO PAXS. WOMAN AND CHILD.
 1645. GREG AT OPS ADVSD.
 1655. US CUSTOMS REQ ANOTHER BAG FULL FOR TWO MORE PAXS. BOTH NO SHOWS. ONE ASKING FOR POLITICAL ASYLUM, THE OTHER RAN UPON SEEING US CUSTOMS.
 1657. CAPT ADVSD. GREG AT OPS ADVSD.
 1705. AIRCRAFT DOOR CLOSED. JETBRIDGE PULLED. CET OFF JET BRIDGE
 1747. US CUSTOMS OKD 961 TO DEPART. CET OFF RAMP.
 TOTAL OF SIX BAGS ASKED TO BE PULLED. FIVE WERE LOCATED. SIXTH NOT MANIFESTED. US CUSTOMS FOUND AN EXCESS AMOUNT OF US CURRENCY ON THE WOMAN WITH CHILD AND DOG HIT ON ONE OF PAXS BAG. THE SIX BAGS REQ TO BE PULLED FOUR BELONG TO WOMAN AND CHILD. OF THE FOUR THREE WERE LOCATED. THE FOURTH NOT MANIFESTED AND YET TO BE LOCATED.
 1815 RMOD MARK NELSON ADVSD FULLY OF DELAY AND CODED IT 77Q.

26FEB0012

FO01631-MIAAA 012B

Seizure \$104000

- AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 (757) 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
953	01/22/00	TGU	1125	1146	21	040	E11	143

Connx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
N/A	N/A

Time CET Advised:	Random Search	Nbr CET Officers Ramp: J/B:	Time CET ON Ramp: J/B:	Time CET OFF Ramp: J/B:
/	/	/	/	/

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

INBOUND FLIGHT: AIRCRAFT TYPE: A300 (757) 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
953	LGA	1009	1013	4	WX	E11	167

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors
/	/	/	/	/	/

Nbr Cust Inspectors
/

Time CET Advised:	Random Search	Nbr CET Officers Ramp: J/B:	Time CET ON Ramp: J/B:	Time CET OFF Ramp: J/B:
/	/	/	/	/

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

U.S. CUSTOMS//OUTBOUND CET TEAM// PROFILED AA953 TGU AT E-11, PAXS AND BAGS, SOME BAGS WERE X-RAYED BUT THE PROCESS WAS INTERRUPTED AS SOON AS THE LAST PAX BOARDED AT 1105. AT THIS TIME THERE WERE STILL SEVEN FULL CARTS OF BAGS THAT NEEDED TO BE LOADED. ACCORDING WITH SEC DRIVER U.S. CUSTOMS ARRIVED AT THE GATE AFTER 1045,.....

FL953/22JAN MIA DM
FL953/22JAN MIA DM ACFT SCH

Sylvia O'Brien

22 1629 3A3FOA MIA-CBD
DM953/22 MIA 01/98

22 1743 9C08AF MIA-7JT
DM953/22 MIA 21/04D

CET TEAM X-RAYING BAGS / 2 OFFICERS / DISCONTINUED 10MINS PRIOR TO DEPARTURE / 7 FULL CARTS OF BAGS STILL NEEDED TO BE LOADED.

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 (757) 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
961	09/09	CLD	16:55	17:50	29	04D	E3Z	105

Conx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
JOSE OPS	16:05

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
No	(Yes/No)	J/B: 4	Ramp: 1705 J/B: 1620	Ramp: 1718 J/B: 1714

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

INBOUND FLIGHT: AIRCRAFT TYPE: A300 (757) 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
1796	MBJ	1528	1604	38	AUTEG	E3Z	155

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors
/	/	/	/	/	/

Nbr Cust Inspectors
/

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B:	Ramp: J/B:	Ramp: J/B:

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

CET outbound was profiling flight 961 (CLD) when at 1659 they held a bag with an unrecognised amount of money. PAI bags were requested by CET to be pulled at 1705. Bags were found and pulled at 1718. This was the reason why there was a 29 min. delay.

Were bags sent to Carousel #8 for CET inspection?:

Were there piggybacking issues on Carousel #8 for this flight?:

Are you aware of any Carousel changes for this flight in Customs?:

FL961/09SEP MIA DM
11961/09SEP MIA DM ACFT SCK

09 2203 9C08AF MIA-7X2
JIM961/9 MIA 29/4D
DET REQUESTED BAG REMOVAL

IND HISTORY

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT:

AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
1901	08/19	SDQ	1715	1720	5	04D	D11	256

Connx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
SOZANE	1535

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
YED	(Yes/No)	N/A	N/A	J/B: 1720

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

INBOUND FLIGHT:

AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
916	BOG	1502	1450	N/A	N/A	D11	112

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors
/	/	/	/	/	/

Nbr Cust Inspectors
/

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B:	J/B:	J/B:

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

U.S. CTMS PROFILED FLT 1901 SDQ //PAXS ONLY//
THE FIRST PAX BOARDED AT 1630, BUT U.S. CTMS RQSTD FIVE PAXS AT THE TIME, IN ADDITION, ONE OF THE U.S. CTMS AGTS RQSTD THE JTBG DOOR CLOSED, THAT IT MADE VERY DIFFICULT FOR THE SEC AGT TO SEE THE PROCESS. INTL SEC SOU WAS NOT PRESENT UNTIL 1711 DUE TO AT THE SAME TIME FLT 961 CLO WAS ALSO PROFILED.

Sela Otis

FL1901/19AUG MIA DM
FL1901/19AUG MIA DM ACFT 079

19 2125 24F1FA MIA-SOL
DM1901/19 MIA 5/4D
CET ACTIVITIES

Are you aware of any Carousel changes for this flight in Customs?:

**AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT**

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
377	5-26-79	DAP	0830	0841	11	04	51	195

Connx Time	# Connx Psgrs	# Connx Bags	# Large Party

RMOD Contact	Time Contact
LARRY	0740

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
	(Yes/No)	6 J/B: 6	0740 J/B: 0830	0835 J/B: 0820

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
YK3	unknown	Yes

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors

Nbr Cust Inspectors

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
	Yes/No	J/B:	J/B:	J/B:

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach

MIAQFAA
MIAQFAA 261559 256A20 MIA/5JH

PROFILE OF BAGS AND PAXS FOR FLT 377 DAP. FIRST BAG X-RAYED AT 0749 AND THE LAST AT 0805. ONLY THREE CNTR X-RAYED: AT 0819 LOADING PROCESS WAS STOPPED TO LOOK FOR BAGS BELONGING TO DETAINED PAXS FREDICK/WILMARE, SENAT YOLAND AND STERLIN/MATHIEU. LOADING WAS CONTINUED AT 0835 AND THE LAST CNTR LOADED AT 0844 WITH THE DOORS CLOSING AT 0850.

J HEH 090479

26MAY1559
F001631-MIAAA.2041

to pull his one bag took 5 minutes (undexamine)

Signature
1000

Had no bags review request to pull bags for Fredrick

Pax still coming down jetway at 0835. AA agents were disputing w/ AA security as to whether they should close the doors. Delay due to AA's inability to decide to close the aircraft doors A34448

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT:

AIRCRAFT TYPE:
(Circle one)

A360 757 727 MD11 S80 D10

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
377	3-17-78	PAP	0825	0912	47	040	E1	266

Conn Time	# Conn Psgrs	# Conn Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
/	/

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B: 10	J/B: 0810	J/B:

Positive Find ?	How Much ?	Message Sent ?
YES	UNDISCLOSED	Yes/No Attach

INBOUND FLIGHT:

AIRCRAFT TYPE:
(Circle one)

A300 757 727 MD11 S80 D10

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
/	/	/	/	/	/	/	/

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors
/	/	/	/	/	/

Nbr Cust Inspectors
/

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B:	J/B:	J/B:

Positive Find ?	How Much ?	Message Sent ?
/	/	Yes/No Attach

MIAQFAA
.MIAQFAA 171913. 256A20 MIA/5JH

DURING THE X-RAYING OF BAGS FOR SELECTEES AT THE C CONCOURSE FOR FLT 377 MIA/PAP A LARGE AMT OF UNDECLARED CURRENCY WAS DISCOVERED IN ONE OF PAX TIFFANY BUCKINS BAGS. HOWEVER DUE TO MISCOMMUNICATION AND SOME CONFUSION THE PAX DISAPPEARED FROM THE TKT X-RAY AREA AND DID NOT BOARD THE FLT. THIS INITIATED A BAG FULL FOR THE OTHER CHECKED BAG. AS RAMP PERSONNEL WERE UNABLE TO LOCATE THE BAG THE A/C WAS PERMITTED TO PROCEED WITH AA'S ASSURANCE THAT THE BAG WOULD BE RETURNED FROM PAP ASAP.

J HEH 090479

17MAR1978

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT:

AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
961	03/21/99	CLO	1655	1702	-7	AD	E31	159

Connx Time	# Connx Psgs	# Connx Bags	# Large Party
/	/	/	/

RHOD Contact	Time Contact
62665	1435

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
YES	Yes/No	N/A J/B: 7	N/A J/B: 1600	N/A J/B: 1650

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

INBOUND FLIGHT:

AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
934	GYE	1537	1534	N/A	N/A	E31	175

U.S. CTMS PROFILED FLT 961 CLO //RANDOM PAXS// SEC AND OPS WERE ADVD AT 1433....
THE INBOUND FLT 934 GYE WAS CLRD AT 1601 AT THE SAME TIME CABIN SVC BEGUN THE CLEANING OF THE A/C; THAT PROCESS LASTED UNTIL 1628...U.S. CTMS WAS INQUIRING ABOUT PAX MURIEL/J XFER FROM FLT 1579 EWR; HIS FOUR BAGS WERE RETRIEVED AT 1639 PLANE SIDE BEFORE LOADED. THE PAXS BOARD WAS SMOOTH UNTIL TWO WHCHR PAXS LEDESMA/JUTH AND PEDR XFER FROM FLT 1731 IN AT 1422 ARRIVED AT THE GATE AT 1643//WHEN THE REG PAXS WERE BOARDING//IN ADDITION AN AILE CHAIR WAS RQSTD FORMING A JAM AT THE ENTRANCE OF THE A/C...AT 1650 THE LAST PAX BOARDED; BUT, DUE TO THE FACT THAT MOST OF THE PAXS WERE CARRYING HEAVY AND OVERSIZE CARRY-ON THE NUMBER ONE F/A REFUSE TO CLOSE THE DOOR UNTIL ALL PAXS WERE SITTING... AT 1658 ONE OVERSIZE BAG AND BABY STROLLER WAS GATE CHKT DUE TO NO SPACE AVIABLE IN THE PAX CABIN...A 1704 THE FWD BELLY HAD TO BE REOPEN TO LOAD THE TWO PCS...

Sata Chen

Were bags sent to Carousel #8 for CET inspection?:

FI 961/21MAR MIA-DM
FI 961/21MAR MIA DM ADPT 522

PI 2244 @POW04 MIA-7X2
OMMADP 961/21 MIA 7/40
CET MONITORING DEPARTURE. (CUSTOMER CALLED OFF BRIDGE AT 1437, HOWEVER JETBRIDGE WAS BACKED UP AND LOADING IMPACTED AS RESULT)

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 (757) 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
961	4/4/89	C10	1655	1700	05	04D	D7	184

Connx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RAMP Contact	Time Contact
GREGG	1626

Time CET Advised:	Random Search	Nbr CET Officers Ramp	Time CET ON Ramp	Time CET OFF Ramp
N/A	Yes/No	6	1626	1705

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

INBOUND FLIGHT: AIRCRAFT TYPE: A300 (757) 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
1981	CGA	1537	1516	/	/	D7	184

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors	Nbr Cust Inspectors
/	/	/	/	/	/	/

U.S. CUSTOMS/CET TEAM/PROFILED FLT 961 CLO/ RANDOM PAXS/ AT 1620 THE FIRST PAX WAS BOARDED. AT 1626 CET TEAM ARRIVED AT THE GATE AND REQUESTED TO SLOW DOWN THE PROCESS AT 1631 PAX OSORIO/ESMERALDA WAS PROFILED, AFTER ROUTINE QUESTIONS, AT 1633 CET TEAM DECIDED FOR HAND CHECK SEARCH AND USD CURRENCY WAS DISCOVERED TAPED AROUND HER BODY. AT 1651 HER THREE BAGS WERE REQUESTED AND AT 1700 ALL BAGS WERE RETRIEVED.

Lyla Chen

FL 961/04APR MIA DM
FL 961/04APR MIA DM ACFT SUJ

04 2141 8E0904 MIA-7X2
DM961/4 MIA 5/41
CET ACTIVITIES

Were bags sent to Carousel #8 for CET inspection?:

Were there piggybacking issues on Carousel #8 for this flight?:

Are you aware of any Carousel changes for this flight in Customs?:

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 **727** MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
423	6/31	SDR	1835	1925	1	040	D18	131

Conn Time	# Conn Psgs	# Conn Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
D-DIAMBER (NATE)	1800

Time CET Advised	Random Search	Nbr CET Officers Ramp	Time CET ON Ramp	Time CET OFF Ramp
/	/	J/B: 5	J/B:	J/B: 1800

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

US CUSTOMS PROFILED FLT 423 SDR /PAXS AND BAGS/.
FIRST PAX BOARDED AT 1829. AT 1845 CSM ADVI SEC THAT
THE FLT WAS HOLDING TO CNCT PAXS OF FLT 1397 JFK IN AT
1845 D-17, LAST PAX PRESENT AT THE GATE BOARDED AT 1849
AFTER THAT, EVENTHOUGH SEC SUP ASKED TO CLOSE THE DOOR
THEY WOULD NOT DO IT. RAMP SIDE THE AFT BELLY WAS CLOSED
AT 1847, BUT THE FWD BELLY REMAINED OPEN WAITING FOR THE
CNCTG BAGS NOTHING WAS LOADED FROM 1847 UNTIL 1907, WHEN
10 BAGS WERE RCVD AND AT 1908 FIVE MORE BAGS, ALL FROM
THE SAME FLT.

A GROUP OF 10 PAXS OF FLT 1397 JFK REACHED THE GATE AT
1900.

OPS PLANNER WAS ADVI THAT AS LONG AS BAGS ARE REACHING THE
GATE, IT WILL X-RAYED. BUT XFER SUPPORT WOULD SAID THAT
US CUSTOMS WERE HOLDING THE PROCESS SEC PLANNER ASKED OPS
TO POINT THE CAMERA TO GATE. SEC ISC CALL OPS PLANNER NATE
AND EXPLAINED HIM OF THE SITUATION BUT HE SAID THAT THE
RMOD J/TIMHERMAN WILL MAKE THE DECISION.

[Handwritten Signature]

FL423/31JUL MIA DM
FL423/31JUL MIA DM ACFT 721

31 2315 9C08AF MIA-E9H
DM423/31 MIA 14/04D USC UP & DOWN CHRG FLIGHT

END HISTORY

What is this about pointing the camera at the gate?

Di X
IN Band

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 (757) 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
2160	6/11	LAX	13:20	13:27	7	Ø4D	D-20	150

Conx Time	# Connx Psgrs	# Connx Bags	# Large Party
—	—	—	—

RMOD Contact	Time Contact
—	—

Time CET Advised:	Random Search	Nbr CET Officers	Time CET ON	Time CET OFF
	Yes (No)	Ramp: 2 J/B: —	Ramp: 12:33 J/B: —	Ramp: 13:07 J/B: —

Positive Find ?	How Much ?	Message Sent ?
No	—	Yes/No Attach

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors

Nbr Cust Inspectors

Time CET Advised:	Random Search	Nbr CET Officers	Time CET ON	Time CET OFF
	Yes/No	Ramp: J/B:	Ramp: J/B:	Ramp: J/B:

Positive Find ?	How Much ?	Message Sent ?
		Yes/No Attach

Customs X-raying bags Rampside - Blocked fuelers from fueling aircraft

The statement from the security driver: "The X-ray truck was blocking the fuel truck. They are X-raying bags by customs, checking by X-rays at 12:33. They finish at 13:07. A total of 6 CWS sent to customs."

Security driver asks customs to move their truck so the fuelers can get in and fuel the aircraft. Customs started to "hold on, just a few more." After approx 5-6 mins, they moved their truck.

Were bags sent to Carousel #8 for CET Inspection?: —

Were there piggybacking issues on Carousel #8 for this flight?: —

Are you aware of any Carousel changes for this flight in Customs?: —

**AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT**

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10 **737**
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
027	3-12-01	GUA	1115	1152	47	090	06	128

Conx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
PERK	0935

Time CET Advised:	Random Search	Nbr CET Officers Ramp: J/B:	Time CET ON Ramp: J/B:	Time CET OFF Ramp: J/B:
0935	Yes/No	1 Ramp: 5 J/B:	1109 Ramp: J/B:	1140 Ramp: 1140 J/B:

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
Yes	17 Tax	Yes

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors

Nbr Cust Inspectors

Time CET Advised:	Random Search	Nbr CET Officers Ramp: J/B:	Time CET ON Ramp: J/B:	Time CET OFF Ramp: J/B:
	Yes/No			

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach

DURING ROUTINE PAX INTERVIEWING PAX OVALLE WAS FOUND TO HAVE IN EXCESS OF FOURTEEN THOUSAND US. CUSTOMS REQUESTED BAG PULL AT 1104 RESENDED REQUEST AT 1107 AND REINSTATED SAME AT 1109. AT 1140 AFTER BOTH CARGO HOLDS WERE SEARCHED AND THE BAGS NOT FOUND THE A/C WAS PERMITTED TO DEPART. DELAY OF 41 MINS 04D.

JEFF HEW ISC MIA

Were there plgybacking issues on Carousel #8 for this flight?:

Are you aware of any Carousel changes for this flight in Customs?:

Airline & Flight#	VC 6001	AA 1735		
ETD	1115	1330		
Location	COS	KID		
Flight Type: (Circle)	Bolo- Ops Target	Bolo- Ops Target	Bolo- Ops-Target	Bolo- Ops- Target
Bolo Worked ?	Yes - No	Yes - No	Yes - No	Yes - No
Bolo Results ? (Circle)	Positive - Negative	Positive - Negative	Positive - Negative	Positive - Negative
Time Notified Airline	1030	1230		
Person Notified	AGGSI	AGGSI		
Time Inspector At Gate	1030	1230		
Actual Departure	1120	1350		
Delay: If "Yes" state reason below	Yes - No	Yes - No	Yes - No	Yes - No
# Locals Working	01	01		
Time Boarding Started	1100	1255		
# Pax on Flight	52	105		
Time Last Pax Boarded	1115	1327		
Last Pax Stopped ?	Yes No	Yes - No	Yes - No	Yes - No
Total # Pax Stopped	02	5		
# Pax Exams - CP503's	01	2		
Time Completed Pax Processing	1110	13 ²⁰		
Baggage Exam Start Time	1045	12 ⁵²		
Type of Examination and Total # of Bags Examined	Opened <u>07</u> X-Rayed <u>92</u> K-9 _____	Opened <u>21</u> X-Rayed <u>283</u> K-9 _____	Opened _____ X-Rayed _____ K-9 _____	Opened _____ X-Rayed _____ K-9 _____
Total Bags on Flight	92	273		
Last Bag Presented		13 ⁴⁶		
Time Completed Baggage Processing		13 ⁴⁸		
Number of Forced 4790's and Total Amount	# _____ \$ _____	# _____ \$ _____	# _____ \$ _____	# _____ \$ _____
Seizure(s) this Flight	Yes - No	Yes - No	Yes - No	Yes -

Comments: See attached list for AA 1735 Info

**AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT**

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
A35	08-10-00	KIN	1330	1350	20	04D	E8	

Connx Time	*Connx Rsgrs	#Connx Bags	#Large Party
/	/	/	/

RMOD Contact	Time Contact

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
	Yes/No	J/B:	J/B:	J/B:

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
/	/	/

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
/	/	/	/	/	/	/	/

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors
/	/	/	/	/	/

Nbr Cust Inspectors
/

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
	Yes/No	J/B:	J/B:	J/B:

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
/	/	/

US. CUSTOMS PROFILED FLT 1735 KIN E-8 ETD 1330. PAXS WERE RANDOMLY GREENED IN THE JETBRIDGE AND BAGS WERE X-RAYED RAMP SIDE. MOST OF THE BAGS WERE AT THE GATE ON TIME OR EARLIER, US. CUSTOMS ARRIVED AT THE GATE AT 1235, AT 1250 ONE X-RAY SET-UP IN THE FWD BELLY, AND THE FIRST BAG LOADED AT 1255. /ONE CART/ UNTIL 1258, AFTER THAT THE PROCESS WAS CEASED, DUE TO THE X-RAY NEEDED TO BE MOVED TO THE AFT BELLY AS A RESULT OF THE SECOND X-RAYED MORIL THAT ARRIVED AT 1252 WENT OUT OUT OF SERVICE. NOT ONLY, US. CUSTOMS CEASED THE PROCESS, THE BAGS FOR THE FWD BELLY WERE HELD UNTIL THE MACHINE WAS WARMED UP/IT NEVER HAPPENED/, AFTER 17 MINS THAT THE X-RAY WAS INOPERATIVE THE FIRST BAG, FINALLY, WAS LOADED /IT WAS AT 1315/, AND THE LAST BAG LOADED 1336. IN THE AFT BELLY THE LAST BAG LOADED AT 1347.

FL1735/10AUG MIA DM
FL1735/10AUG MIA DM ACFT 5BU

10 1755 8E0904 MIA-5JT
DM1735/10 MIA 20/04D
CET TEAM XRAY

END HISTORY.

Carl Hagan
526-5885
871-2908

Air Jan.
526-2000
#2516

INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT:

AIRCRAFT TYPE:
(Circle one)

A300 757 (727) MD11 S80 D10

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
423	07/31	SDR	1855	1925	6	040	D18	131

Conx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
D- PLANKER (NATE)	1800

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B: 5	J/B:	J/B: 1800

Positive Find?	How Much?	Message Sent? Yes/No Attach
/	/	/

US. CUSTOMS PROFILED FLT 423 SDR /PAXS AND BAGS/.
FIRST PAX BOARDED AT 1829. AT 1845 DSM ADVI SEC THAT
THE FLT WAS HOLDING TO CNCT PAXS OF FLT 1397 JFK IN AT
1845 D-17, LAST PAX PRESENT AT THE GATE BOARDED AT 1849
AFTER THAT, EVENTHOUGH SEC SUP ASKED TO CLOSE THE DOOR
THEY WOULD NOT DO IT. RAMP SIDE THE AFT BELLY WAS CLOSED
AT 1847, BUT THE FWD BELLY REMAINED OPEN WAITING FOR THE
CNCTG BAGS NOTHING WAS LOADED FROM 1847 UNTIL 1907, WHEN
10 BAGS WERE RCVD AND AT 1908 FIVE MORE BAGS, ALL FROM
THE SAME FLT.

A GROUP OF 10 PAXS OF FLT 1397 JFK REACHED THE GATE AT
1900.

OPS PLANNER WAS ADVI THAT AS LONG AS BAGS ARE REACHING THE
GATE, IT WILL X-RAYED. BUT XFER SUPPORT WOULD SAID THAT
US. CUSTOMS WERE HOLDING THE PROCESS SEC PLANNER ASKED OPS
TO POINT THE CAMERA TO GATE. SEC ISC CALL OPS PLANNER NATE
AND EXPLAINED HIM OF THE SITUATION BUT HE SAID THAT THE
RMOD J/TIMHERMAN WILL MAKE THE DECISION.

John Plank

FL423/31JUL MIA DM
FL423/31JUL MIA DM ACFT 721

31 2315 9C08AF MIA-E9H
DM423/31 MIA 14/04B USC UP & DOWN CHKG FLIGHT

END HISTORY

What is this about pointing the camera at the gate?

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT:

AIRCRAFT TYPE:
(Circle one)

A300 757 727 MD11 S80 D10

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
931	07-20-00	LTO	1910	1919	09	84D	D4	157

Connx Time	# Connx Rsgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact
Greg	1831

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	8 J/B: 10	1830 J/B: 1830	1915 J/B: 1910

Positive Find ?	How Much ?	Message Sent ?
/	/	Yes/No Attach

INBOUND FLIGHT:

AIRCRAFT TYPE:
(Circle one)

A300 757 727 MD11 S80 D10

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
/	/	/	/	/	/	/	/

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors
/	/	/	/	/	/

Nbr Cust Inspectors
/

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B:	J/B:	J/B:

Positive Find ?	How Much ?	Message Sent ?
/	/	Yes/No Attach

Get to and prefiled T931 LTO. PAXS and BAGS at 1830. got back to X-ray. bags on both belts. per crew report needed 8 ramp clerks to load bags and only had 10. At 1910 3 bags had to be open. due to that we took a 9 minute delay.

FL931/20 MIA DM
FL931/20 MIA DM ACFT 5CJ

20 2349 8E0902 MIA-8JV
DM931/20 MIA 9/04D
CUSTOMS CHECKING BOTH
PAXS AND BAGS!

not arrived @ 1815
 + up 2 X-Rays @ 1820
 began X-raying rear belly @ 1823
 in had 1st cart @ 1835
 rayed front + back simultaneously
 loaded bags on front belly ourselves
 due to low manpower
 - Loaded Mail on rear belly til 1908
 Began 2nd Last bag cart @ 1909
 Began Last cart @
 * Finished front belly @ 1911
 Finished + pulled off rear belly @ 1917
 Pushed out @ 1925

MAILS - CPS03's

Time Completed Pax Processing	2111			
Baggage Exam Start Time	2080			
Type of Examination and Total # of Bags Examined	Opened <u>20</u> X-Rayed <u>253</u> K-9 _____	Opened _____ X-Rayed _____ K-9 _____	Opened _____ X-Rayed _____ K-9 _____	Opened _____ X-Rayed _____ K-9 _____
Total Bags on Flight	253			
Last-Bag Presented	2120			
Time Completed Baggage Processing	2122			
Number of Forced 4790's and Total Amount	# _____ \$ _____	# _____ \$ _____	# _____ \$ _____	# _____ \$ _____
Seizure(s) this Flight	Yes - No	Yes - No	Yes - No	Yes - No
Comments:				

INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
967	10-26-00	U10	1705	1727	22	04D	D4	164

Connx Time	# Connx Psgrs	# Connx Bags	# Large Party
/	/	/	/

RMOD Contact	Time Contact

Time CET Advised:	Random Search	Nbr CET Officers	Time CET ON	Time CET OFF
	Yes/No	Ramp: 02 J/B: 05	Ramp: 1600 J/B: 1600	Ramp: 1725 J/B: 1712

Positive Find ?	How Much ?	Message Sent ?
No	/	Yes/No Attach

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
/	/	/	/	/	/	/	/

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors
/	/	/	/	/	/

Nbr Cust Inspectors
/

Time CET Advised:	Random Search	Nbr CET Officers	Time CET ON	Time CET OFF
/	Yes/No	Ramp: J/B:	Ramp: J/B:	Ramp: J/B:

Positive Find ?	How Much ?	Message Sent ?
/	/	Yes/No Attach

MIAQFAA
MIAQFAA 262250 256420 MIA/H20

C.E.T. PROFILED BAGS AND PASSENGERS ON THIS FLIGHT. THE DELAY HAPPENED AT THE RAMP AS THERE WAS ONLY ONE VAN X-RAYING AND TWO C.E.T OFFICERS FOR APPROX. 209 BAGS. THE X-RAYING/LOADING STARTED AT 1623 AT THE AFT. BELLY. AT 1640 WE ASKED CET IF WE COULD START LOADING THE FORWARD BELLY AND THEY GAVE US A NEGATIVE ANSWER. AT 1700 THEY AUTHORIZE THE CREW TO LOAD THE FORWARD WITHOUT XRAYING. THIS SITUATION CREATED A 22 MINUTE DELAY. THE AFT. BELLY CLOSED AT 1700 AND THE THE FORWARD AT 1725.

END OF REPORT
LUZ M DIAZ/INTL. SECURITY

26OCT2252
P001631-MIAAAA 6010

Were there piggybacking issues on Carousel #8 for this flight?:

Are you aware of any Carousel changes for this flight in Customs?:

AMERICAN AIRLINES
INTERNATIONAL OPERATIONS DELAY REPORT

OUTBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	Date	To	Skd Dptr	Act Dptr	Delay Min	Code	Gate	Load Out
967	9-12-00	V10	17:05	17:40	35	04D	E7	165

Connx Time	*Connx Pags	*Connx Bags	*Large Party
/	/	/	/

RMOD Contact	Time Contact
NO	NO

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
N/A	(Yes/No)	8 J/B: 1	N/A J/B: N/A	17:40 J/B: 17:20

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
NO	N/A	

INBOUND FLIGHT: AIRCRAFT TYPE: A300 757 727 MD11 S80 D10
(Circle one)

Flight #	From	Skd Arvl	Act Arvl	Delay	Reason	Arvl Gate	Load In
/	/	/	/	/	/	/	/

1st Bag On Belt	Last Bag On Belt	INS Clear	Customs Clear	QC Clear	Nbr INS Inspectors

Nbr Cust Inspectors

Time CET Advised:	Random Search	Nbr CET Officers Ramp:	Time CET ON Ramp:	Time CET OFF Ramp:
/	Yes/No	J/B:	J/B:	J/B:

Positive Find ?	How Much ?	Message Sent ? Yes/No Attach
/	/	/

MIAQFAA
MIAQFAA 122327 256A20 MIA/H20

DELAY FLIGHT 967 ETD 1705 A/C NBR 5BT
AT APPROX. 1705 EMIL WAS ADVISED BY PLANNER OF C.E.T.
ACTIVITY AT GATE E7 THIS WAS ALREADY DEPARTURE TIME OF
FLT. IMMEDIATELY BOTH EMIL AND LUZ WENT TO THE GATE FINDING
OUT THAT CET HAD REQSTD A BAG PULL TO C.S.M. OF FLT.
ONCE AT THE RAMP CREWCHIEF INFORMED US THAT IT WILL TAKE

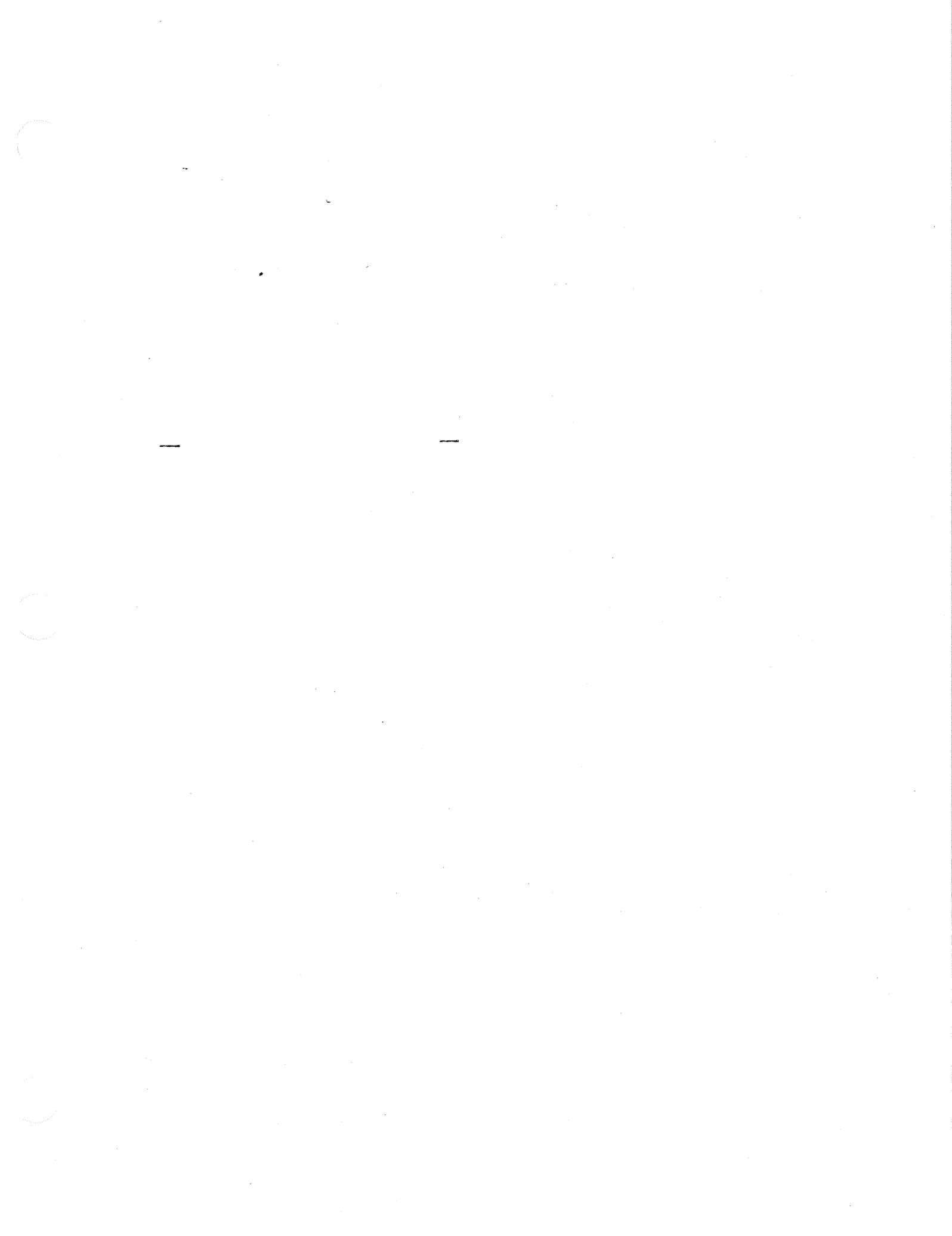
THEM ANOTHER 20 MINUTES TO LOCATE BAGS WE INFORMED C.E.T.
WHEN THEY HEARD THIS THEY ASKED US TO FORGET ABOUT THE
THE BAGS AND THIS WAS AT 1727

12SEP2320
FO01631-MIAAA 1759
DELATIALS

FL987/12SEP MIA DM
FL987/12SEP MIA DM ACFT SBT

12 2227 8E0904 MIA-8IU
DM927/12 MIA 35/4D

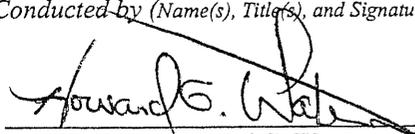
US CUSTOMS REQ BAG FULL FAX FRIAS BAG FULL CXL
END HISTORY





MEMORANDUM OF ACTIVITY



<i>Case Number:</i> 2002-0019	<i>Type of Activity:</i> Personal Interview	<i>Conducted by (Name(s), Title(s), and Signature(s)):</i>  Howard G. Waters Special Agent Date: October 31, 2001
<i>Date:</i> 10/25/2001	<i>Reporting Office:</i> Miami	
<i>Time:</i> 09:45 a.m.		
<i>Subject of Activity:</i> Chester William Olejasz Chief Inspector Outbound Inspections United States Customs Service Miami, Florida —		<i>Location of Activity:</i> Miami International Airport Miami, Florida

On October 25, 2001, the Treasury Office of Inspector General interviewed Chester William Olejasz, Chief Inspector, GS-13, Outbound Inspections, United States Customs Service (USCS), Miami, Florida. Olejasz was interviewed regarding allegations that USCS managers were providing American Airlines at Miami International Airport (MIA) three hour advanced notice prior to conducting outbound inspections.

Olejasz provided in substance the following information:

Olejasz stated that he has worked for the USCS since 1987. Olejasz serves as the Chief Inspector for Outbound Inspections at Miami International Airport and supervises and coordinates the Outbound Inspection process. Olejasz denied that USCS gives a three-hour notice to American or any other airline. Olejasz stated that the current policy is to give no notice to any airline regarding an inspection. Olejasz did state that USCS Outbound Inspectors sometimes do arrive approximately forty-five minutes to one hour prior to departure to inspect passengers and baggage but reiterated that no advance warning is given. Olejasz said that sometimes the airline is notified because USCS has a Be On the Look Out (BOLO) warning for a possible National Criminal Intelligence Center (NCIC) lookout or other law enforcement warrant.

Olejasz admitted that the outbound seizures at MIA had dropped significantly this past year. Olejasz said that in Fiscal Year (FY) 2000, USCS Inspectors seized over ten million dollars in undeclared outbound currency. In FY 2001, the amount of undeclared currency dropped to four million dollars. Olejasz opined that there were a couple of reasons that the outbound seizures dropped. Olejasz stated that USCS had become more focused on Risk Management and less on

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MEMORANDUM OF ACTIVITY

enforcement. He (Olejasz) said that USCS requires all Inspectors to submit a data collection form on every inspection that they conduct. Olejasz said that Inspectors were conducting fewer inspections because of the paperwork involved. Olejasz said that outbound inspections were down twenty percent. He (Olejasz) said another possible reason for the drop in seizures is that currency smugglers are using other ports such as Fort Lauderdale and West Palm Beach, because the outbound teams there are much smaller. Olejasz provided the OIG with a copy of the USCS MIA Outbound Inspections Team status spreadsheet.

Attachments:

REVIEWED BY (Initials): DB DATE: 1/28/02

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Date Printed: 1/29/02
OI Form-09 (07/01)

Office of Inspector General – Investigations
Department of the Treasury



MEMORANDUM OF ACTIVITY



<i>Case Number:</i> 2002-0019	<i>Type of Activity:</i> Personal Interview	<i>Conducted by (Name(s), Title(s), and Signature(s)):</i> Howard G. Waters Special Agent Date: November 23, 2001
<i>Date:</i> 11/19/2001	<i>Reporting Office:</i> Miami	
<i>Time:</i> 11:30 a.m.		
<i>Subject of Activity:</i> Nathaniel Michael Norwood, Chief Inspector United States Customs Service Miami International Airport Miami, Florida __		<i>Location of Activity:</i> Norwood Residence 5713 Descartes Circle Boynton Beach, Florida

On November 19, 2001, the Treasury Office of Inspector General interviewed Nathaniel Michael Norwood, Chief Inspector, GS-13, Passenger Processing, United States Customs Service (USCS), Miami, Florida. Norwood was interviewed regarding allegations that USCS managers were providing American Airlines at Miami International Airport (MIA) three hour advanced notice prior to conducting outbound inspections.

Norwood provided in substance the following information:

Norwood has worked for the USCS since 1971. Norwood currently is the Chief Inspector for the Passenger Processing Unit at MIA. Norwood said that he previously served as the Chief Inspector for Outbound Operations at MIA, which conducts inspections of airlines and passengers departing the United States.

Norwood stated that during his tenure at Outbound he and Port Director Jay Ahern were under a lot of pressure from local management and USCS Headquarters to work with the trade community and the airlines. Norwood stated that then Customs Management Center (CMC) Director D.Lynn Gordon insisted that the USCS airport staff accommodate the airlines with passenger and cargo processing as much as possible.

Norwood said that the certain airlines had numerous delays because of outbound exams, specifically, American Airlines (AA), Aces and Avianca Airlines. Norwood stated that these airlines complained about the delays and as a result a meeting between American Airline officials and MIA USCS was held. Norwood related that the outbound delays were caused by

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MEMORANDUM OF ACTIVITY

exams of possible currency smugglers and that if a suspect was detained that the USCS required that the suspect's baggage be removed from the plane. This sometimes required AA personnel to unload all of the baggage, locate the suspect's bag and then reload the baggage. This caused several delays for certain high traffic smuggling flights to suspect countries like Colombia.

Norwood said that a meeting between himself, Rick Arner, Manager, International Operations, American Airlines, Miami International Airport, Miami, Florida, and Ahern was held to work out some of the delay problems. Norwood stated that Arner suggested that the USCS give American Airlines advance notification prior to an outbound exam-taking place so that they (AA) could provide additional personnel to assist with unloading and reloading baggage. Norwood admitted that he and Ahern agreed to provide American Airlines with a one-hour advance notification. Norwood also related that once the advanced notice was given to American Airlines and ACES wanted the same advanced notice. Norwood said that Ahern extended the same one-hour advanced notification to ACES and Avianca Airlines. Norwood stated that once the plan was in place AA would pressure us to get more than the one hour advanced notice. American Airlines representatives would call early in the morning to get a list of the flights scheduled for outbound examinations. Norwood said that American Airlines would go "ballistic" if they didn't get their advanced notification. Norwood admitted that several times more than one-hour advanced notice was given to American Airlines.

Norwood stated that when Tom Winkowski took over as Port Director at MIA, he abolished the advance notification policy. Norwood stated that Winkowski said that the advanced notification compromised USCS' security. Norwood stated that Winkowski's policy change was disseminated through a letter to all inspection personnel at the airport.

Norwood provided the OIG with an affidavit, copies of a page from a town hall meeting with then Commissioner Raymond Kelly and a copy of a letter to American Airlines rescinding the advance notification policy.

Attachments:

REVIEWED BY (Initials): DB DATE: 12/6/01

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STATEMENT



STATEMENT OF: Nathaniel Michael Norwood PAGE 1 OF 7 PAGES

I, N. MICHAEL NORWOOD, hereby make the following free and voluntary sworn statement to HOWARD G. WATERS, who has identified him/herself to me as a Special Agent with the Office of Inspector General, United States Department of the Treasury.

1 " See Attached Statement "

2 _____

3 _____

4 _____

5 _____

6 _____

7 _____

8 _____

9 _____

10 _____

11 _____

12 _____

13 _____

Witness' Initials: _____

Initials: nmw

County of: Palm Beach

Date/Time: November 29, 2001

State of: Florida

Location: Baynton Beach

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I, Nathaniel Michael Norwood, am employed by the U.S. Customs Service as Chief Inspector (GS-13), Passenger Processing Operations, Miami Service Port, Miami, Florida.

Allegation: Former Miami Service Port Director, Jay Ahern gave American Airlines preferential treatment, requiring inspectors to provide a one hour notification prior to working American Airline flights.

- The one hour notice policy was implemented in a spirit of cooperation with American Airlines and ACES to allow them an opportunity to assign additional personnel and equipment on flights they knew Customs was going to work to help minimize flight delays. American was experiencing reoccurring delays on a regular basis as a result of Customs' outbound enforcement examinations. Port Director, Jay Ahern and myself were the ranking Customs officials at a meeting with American Airlines representatives to discuss various actions that could be taken to help minimize flight delays. It was agreed Customs would notify American one hour prior to working designated flights and American would provide additional man power to help load bags that were x-rayed and offload bags when necessary. It should also be known that at the time of this agreement, Customs' national policy emphasized Ports to work in partnership with their "customers" to resolve problem issues. There was even greater pressure applied to finding a resolution to this problem with American by former CMC Director, D. Lynn Gordon. She made it known she wanted this issue resolved and did not want any further complaints from American Airlines. In time this agreement proved to work against our enforcement efforts. American used the notification to ensure they had additional management personnel in the jet ways of all outbound flights that were worked by Customs Inspectors. Inspectors were constantly harassed, threaten with calls to the CMC Director. American management would constantly flood the jet ways with passengers to ensure their flights would leave on time. This was done with total disregard to the Customs enforcement mission. The initial agreement made in the spirit of cooperation, proved to be a classic case of enforcement actions and facilitation not working in an environment with different goals.
- The one-hour notice policy was raised at a town hall meeting with Commissioner Kelly and Outbound team Members. I was on a temporary duty status "TDY" assignment at the time of the meeting. Commissioner Kelly was not aware of the agreement and would not have been aware of the notification policy since it was a local policy and was implemented years before his appointment to Commissioner of Customs.

- Service Port Director, Thomas Winkowski was contacted by the national Outbound headquarters' office following the Town Hall meeting and was asked to provide comments to the issues raised at the meeting (see attachment #1).
- Shortly thereafter, Mr. Winkowski sent American Airlines a letter notifying them that in order for the Miami Outbound Team to be compliant with national Customs' policies they would no longer provide a one hour notice (see attachment # 2). The one our notice practiced was immediately stopped.

**I declare under penalty of perjury that the foregoing is true and correct.
Executed November 29, 2001 at Boynton Beach, Florida.**

Nathaniel Michael Norwood

Chief Inspector, Passenger Processing Operations

Miami Int'l Airport

P.O. BOX 9979930

Miami, Fl. 33299



DEPARTMENT OF THE TREASURY

U.S. CUSTOMS SERVICE

MIAMI, FLORIDA

MAR 29 1999

ENF- 8:PD:A:O NMN

Mr. Ric Arner
Manager International Operations
American Airlines
P.O. Box 997990
Miami, Florida 33299-7990

Dear Mr. Arner:

The purpose of this letter is to inform you that I have requested that the Miami Outbound Enforcement Team modify several key sections of its operating procedures. I apologize for the short notice, but I believe the below mentioned changes are critical to our enforcement efforts and must be implemented immediately.

In order for the Miami Outbound Enforcement Team to be compliant with national Customs' policies and procedures, we will no longer provide an advance notice to airlines prior to examining targeted flights. At present, the courtesy notice only applies to American Airlines and ACES Airlines. ACES Airlines will also be notified of these changes. While it is understood why this advance notice agreement was implemented, it is found to be inconsistent with Customs' national policy and increases the possibility for compromise of Customs enforcement efforts.

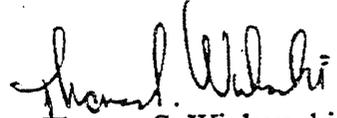
The agreement to have Customs Outbound x-ray vans removed five minutes prior to departure time has been reviewed and determined that it lends itself to internal conspiracies. Miami Outbound Enforcement Teams' SOP has been modified to ensure that Outbound Supervisors are intricately involved in deciding when equipment and personnel are to be pulled off a flight. When making this decision, flight delays will be considered, as well as the enforcement concerns.

I recognize the importance that American Airlines, as well as the entire air industry places on ensuring that aircraft departures are accomplished in a timely matter. Please be assured that we will do everything possible to minimize the impact on American Airlines. I have instructed Branch Chief Norwood to coordinate a meeting for the near future, where this

subject and possible additional changes in our operating procedures may be discussed. Should you have any questions or need additional information, please do not hesitate to contact me at 305 869-2800.

Thank you for your understanding and cooperation.

Sincerely,


Thomas S. Winkowski
Port Director
Miami Service Port

cc: Director, Office of Field Operations, South Florida

American Airlines issues raised during town hall meeting in Miami.

ISSUE:

Recently the Commissioner held a Town Hall meeting for Customs personnel in Miami, Florida. Among the issues raised by the Customs employees present, there were four with regard to American Airlines. They are as follows:

- U.S. Customs in Miami gives American Airlines preferential treatment.
- Customs personnel must have an American Airline Mechanic accompany them when performing an aircraft search.
- U.S. Customs gives American Airlines a one hour notice prior to performing an outbound examination of a departing flight.
- Customs personnel must remove the X-Ray van five minutes prior to departure time of an American Airlines flight.

FINDINGS:

The Miami office was contacted regarding the above issues and were asked to comment accordingly. The following reflect the answers compiled by the Acting Airport Director, Airport CET Chief, and Outbound Enforcement Chief.

- **U.S. Customs in Miami gives American Airlines preferential treatment**

Initial data does not indicate that American Airlines receives any preferential consideration.

There are two charts that were compiled depicting the number of American Airlines planes that were searched in comparison to other airlines.

One chart depicts the flights searched by CET and what percentage of CET searches an Airline receives. American Airlines counts for 13.53% of CET searches. (SEE ATTACHED)

The other chart looks at (for the month of Jan only), total international arrivals by airline and shows the percentage of CET searches. 6.48% of American flights were examined. (SEE ATTACHED)

To get an exact picture of American in comparison to other Airlines, one would have to factor in the country of origination for each flight, the risk factor of each country, how the risk was factored in when selecting flights to search, and any other variable that goes into selecting



STATEMENT



I have read this statement of 7 pages. It is true, accurate, and complete to the best of my knowledge and belief. I have initialed each page, where necessary, and have been given an opportunity to make any corrections or additions. I have also initialed each line where a correction has been made.

[Handwritten Signature]
(Signature)

Subscribed and sworn (or affirmed) to before me this 29th day of November, 2001,
at Boynton Beach, Florida,
(City) (State)

[Handwritten Signature]
Special Agent
Department of the Treasury
Office of Inspector General
Office of Investigations

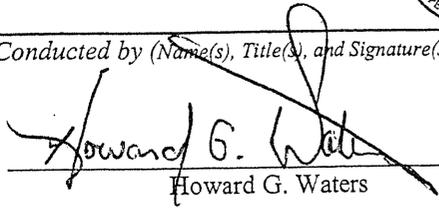
Witness: _____

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MEMORANDUM OF ACTIVITY



<i>Case Number:</i> 2002-0019	<i>Type of Activity:</i> Personal Interview	<i>Conducted by (Name(s), Title(s), and Signature(s)):</i>  Howard G. Waters Special Agent Date: December 6, 2001
<i>Date:</i> 12/5/2001	<i>Reporting Office:</i> Miami	
<i>Time:</i> 10:00 a.m.		
<i>Subject of Activity:</i> Ric Arner, Manager American Airlines Miami International Airport Miami, Florida		<i>Location of Activity:</i> Miami International Airport Miami, FL

On December 5, 2001, the Treasury Office of Inspector General interviewed Ric Arner, Manager, International Operations, American Airlines (AA), Miami, Florida. Arner was interviewed regarding allegations that USCS managers were providing American Airlines at Miami International Airport (MIA) three hour advanced notice prior to conducting outbound inspections.

Arner provided in substance the following information:

Arner stated that he works closely with the USCS Cargo Enforcement Teams (CET) and the Inbound and Outbound Inspection teams. Arner stated that he coordinates with the USCS and American Airlines security, baggage, and maintenance personnel to facilitate inspections of inbound and outbound aircraft.

Arner said that he has a close working relationship with the current Port Director Tom Winkowski and USCS Outbound Chief, Chief Inspector Bill Olejasz. Arner related that he also had a close working relationship with former Port Director Jayson Ahern and former Outbound Chief, Chief Inspector Mike Norwood.

Arner admitted that the USCS previously provided American Airlines with advance notification of outbound inspections. Arner stated that USCS inspectors would call the American Airlines Security Planner and provide advance notice and a list of aircraft to be inspected. The advanced notification was usually one to one and a half hours prior to departure. Arner said that the advance notification allowed him to provide assistance to the USCS in the form of additional personnel to assist with baggage retrieval and passenger processing.

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MEMORANDUM OF ACTIVITY

Arner stated that the advance notification policy came about after a facilitation meeting with Ahern and Norwood. Arner said that the facilitation meetings were held to find ways to improve and speed up the outbound inspection process. Arner said that several outbound flights were regularly delayed because of USCS outbound inspections. Arner said that because of major flight delays it was decided at a facilitation meeting that USCS inspectors would provide American Airlines with advanced notification and in return American would provide additional personnel to assist with the inspection process. Arner said that Ahern made the decision to provide the advance notification and that no official memo was ever drafted to spell out the specifics of the advance notification policy. Arner said that American Airlines was never given any preferential treatment from the USCS or Ahern. Arner said that Ahern told him that the advance notification policy was across the board and applied to all airlines not just American. Arner could not provide a list of other airlines receiving the advanced notification but stated that he thought that Avianca Airlines was included in the program. Arner stated that the advanced notification policy was discontinued shortly after Winkowski became Port Director. Arner provided the OIG with a copy of minutes from a facilitation meeting.

Attachments: —

REVIEWED BY (Initials):

DB

DATE:

1/25/02

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STRATEGIC PROBLEM SOLVING MINUTES REPORT

TEAM/GROUP NAME: American Airlines Security & USCS/MIA
DATE: July 22, 1999
LOCATION: American Airlines Conference Room, Dallas
MEETING #: 12

PROBLEM: *Narcotics Smuggling on American Airlines by persons with ramp access to aircraft 24 hours per day, using aircraft concealment (within the aircraft).*

PERSONS/TEAM MEMBERS ATTENDING:

Ric Arner, American Airlines <u>X</u>	David L. Divan, AA Corporate Security _____
Gonzalo Reinoso, USCS/MIA, ASU _____	Scott Lowen, USCS/SAC Miami _____
Tom Dowd, AA Corporate Security <u>X</u>	Al Feingold, USCS/Rovers, MIA _____
Michael Ginn, USCS/MIA, ASU <u>X</u>	Jim Holden, AA/Miami/Caribbean/ Latin America _____
Tony Knapik, USCS _____	Rodolfo Ramirez Jr., AA Security, Miami _____
Ozzie Martin, USCS/ASU _____	Mary Meier, USCS/MIA, ASU <u>X</u>
Scott Falk, USCS/Counsel _____	Ray Sepulveda, AA Corporate Security _____
Jamie Giertz, AA Engineering _____	Maureen Maurer, AA Corporate Security <u>X</u>
John Reddin, USCS, OI <u>X</u>	Mike Koncir, OFO, HQ <u>X</u>
John Dennis, USCS, SPS, HQ _____	Larry Wansley, AA Corporate Security _____
Nicole Gallagher, USCS, ASU <u>X</u>	
Jeff Heh, AA Security, Miami _____	

FACILITATOR: Mary Rice, USCS/CMC, South Florida

PROJECT STATUS:

The Team met to review and update their progress on action items. Most of the actions from the July 29, 1997 meeting are in place and continuing.

ASSIGNMENTS/PREPARATION FOR NEXT CORE GROUP MEETING:

- American Airlines and USCS will continue to closely monitor the inspectional procedures, and will communicate and work together to resolve any resulting problems.
- Review/complete assigned actions identified throughout the SPS document.
- Members of the Group are to collect data for presentation at the next Group meeting.

NEXT CORE GROUP MEETING:

Date: September 15, 1999
Time: 1:00 PM
Location: AA Cargo Facility Conference Room, Miami

Agenda:

1. Team will review and update their progress on open action items.
2. Discuss data collected by Team members. Team will do an analysis of the data collected.
3. John Reddin requested that the recommendation to collect data on the number of investigations resulting in a spin off to other airlines be put in the Parking Lot until the next meeting.
4. John Reddin requested that the Team revisit the issue of Customs not supporting AA's policy regarding backpacks at the next meeting (Alternative #23). —

Objectives/Expectations:

1. Prevent the use of American Airlines for Narcotics Smuggling.
2. Interdict narcotics and identify those responsible.
3. Arrest and convict violators.
4. Displace narcotics smuggling (other airlines, other means, other destinations)
5. Disrupt narcotics smuggling operations and conspiracies.
6. Deter narcotics smuggling via American Airlines.

Data Collection Period:

The Team agreed on the following data collection periods:

- August 1, 1995 - July 31, 1996
- August 1, 1996 - July 31, 1997
- August 1, 1997 - July 31, 1998

Output Measures

Person(s) Responsible for Recording Measure

- | | |
|--|-------------------------|
| 1. Number of arrests in Miami by Customs:
- AA employees
- Contract People
- Sky Chef
- Cater Air
- Hudson Fuel | USCS/Scott |
| 2. Number and amount of narcotics seized on AA in Miami | USCS/Mary |
| 3. Number of convictions | USCS/Scott |
| 4. All employees terminated in every location limited to smuggling | AA/Tom |
| 5. Number of seizures/arrests other airlines Miami | USCS/Mary & Scott |
| 6. Incidence of use of concealment location on AA aircraft | AA/Maureen
USCS/Mary |
| 7. Number of seizures at other US airports on AA/other | AA/Maureen
USCS/Mary |
| 8. Number of foreign seizures for all flights going to all locations | AA/Maureen |

Outcome Measures

Person(s) Responsible for Recording Measure

- | | |
|---|-------------------------|
| 1. Increase in seizures at foreign countries
(airports where AA flies) | AA/Maureen
USCS/Mary |
| 2. Reduction of seizures/detections of narcotics on AA
in Miami (U.S.) | USCS/Mary |
| 3. Decrease in the seizure to exam ratio on AA aircraft | USCS/Mary |

7/22/99 - MEETING DISCUSSION:

John Reddin reported that there had been no arrests yet but he is expecting some in August or September. There were several food cart seizures in Miami on American Airlines. John said he talks to Tom Dowd daily and American Airlines has been very cooperative. There was a Group discussion on various on-going investigations that John is working on.

The Team had a discussion on data collection. The Team agreed to add a data collection period for August 1, 1998 - July 31, 1999 to the previously agreed upon data collection periods. Data Collection has been amended as follows:

Data Collection Period:

The Team agreed on the following data collection periods:

- August 1, 1995 - July 31, 1996
- August 1, 1996 - July 31, 1997
- August 1, 1997 - July 31, 1998
- August 1, 1998 - July 31, 1999

Output Measures

Person(s) Responsible for Recording Measure

- | | |
|---|-------------------------|
| 1. Number of arrests in Miami by Customs: <ul style="list-style-type: none">- AA employees- Contract People- Sky Chef- Dobbs | USCS/John |
| 2. Number and amount of narcotics seized on AA in Miami | USCS/Mary |
| 3. Number of convictions | USCS/John |
| 4. All employees terminated and/or arrested in every location limited to smuggling | AA/Tom/Maureen |
| 5. Number of seizures/arrests other airlines Miami | USCS/Mary/John |
| 6. Incidence of use of concealment location on AA aircraft | AA/Maureen
USCS/Mary |
| 7. Number of seizures at other US airports on AA/other | AA/Maureen
USCS/Mary |
| 8. Number of foreign seizures for all flights going to all locations | AA/Maureen |
| 9. Number of post seizure investigations by AA which is related to this SPS Team. | AA/Maureen/Tom |

Outcome Measures

Person(s) Responsible for Recording Measure

- | | |
|--|-------------------------|
| 1. Increase in seizures at foreign countries (airports where AA flies) | AA/Maureen
USCS/Mary |
| 2. Reduction of seizures/detections of narcotics on AA in Miami (U.S.) | USCS/Mary |
| 3. Decrease in the seizure to exam ratio on AA aircraft | USCS/Mary |

Mary Meier suggested that data be collected on the number of investigations resulting in a spin off to other airlines. John Reddin asked that this issue be put in the parking lot for the next meeting so that he will have time to discuss it with his boss.

Mike Koncir stated that OI needs to go back to American Airlines after a case has been closed with OI's recommendations on how to fix the problem.

WHAT/HOW	WHO	WHEN
Collect data for additional data collection period of 8/1/98 - 7/31/99.	John/Mary Maureen/Tom	9/15/99
Analyze data at next team meeting.	Team	9/15/99

5/12/99 - MEETING DISCUSSION:

John Reddin was not able to attend the meeting. However, David reported that at a seminar he attended the previous day, John reported that there hadn't been any arrests yet on the American Airlines SPS. Maureen reported that there has been very little drug activity. Mary Meier reported that drug seizures are down on all airlines. David said that drug seizures are down with American Airlines also. Mary Meier said the trend seems to be going back to fast boats. Ric reported that cash going out is also down. Mike Ginn said that when Customs finds drugs in a new location on an aircraft, they notify all the airlines that use that particular type of aircraft.

Mary Meier asked David if someone from Customs in Miami could be represented at the International Security Coordinators (ISC) Training classes. David said yes. Mary told David to call her when they needed them.

Maureen asked Mary Meier for a copy of her Power Point presentation. Mary said she will have a diskette sent to Maureen.

Ric asked Mary Meier if someone from Customs could talk to the pilots at an up-coming seminar. Mary said they would. Ric will send Mary the information.

At the last meeting, a suggestion was made to discuss at the next meeting the need for an SPS on currency smuggling on American Airlines. Ric reported that there had been an SPS with AA and Customs on this issue. Also, approximately four weeks ago, Ric discussed with Tom Winkowski the letter from Customs to AA regarding the new Customs procedures for the Outbound process. The Team agreed that they would not be making the decision as to whether there is a need for an SPS on currency smuggling on American Airlines.

3/25/99 - MEETING DISCUSSION:

Mary reported that John Reddin wasn't able to attend the meeting in Dallas. He told Mary that he had nothing to report. There hadn't been any arrests or seizures yet.

David stated that he attended a training session in Curacao where Michele Rastelli and Jaime Ramsay gave a presentation on penalties, mitigations, trends on drugs going to Europe, etc. It was an excellent presentation. David is going to ask them to speak at his International Security Coordinators (ISC) meeting in May to the European group.

Maureen requested Customs give a presentation to a class of lead agents then in session. Mary volunteered and gave a presentation on Friday. Photos and overheads were flown in from Mary's office and some were left there for them to color copy.

David suggested that in the future we alternate meeting locations between Miami and Dallas. Mary said Customs would be willing, provided they received approval and that there are funds available.

David told Jeff to tell Ric Arner that it is very important that they be represented at our meetings.

2/10/99 - MEETING DISCUSSION:

The Team discussed the data that was collected by both Customs and American Airlines for the time periods previously agreed upon by the Team. In addition, the following clarifications were made as to whether meetings were being held between American Airlines and Customs during those time periods:

8/1/95 - 7/31/96 - Meetings between AA and USCS were not being held during this period.

8/1/96 - 7/31/97 - Meetings between AA and USCS were held during this period.

8/1/97 - 7/31/98 - Strategic Problem Solving Group began meeting on 7/29/97.

Both American Airlines and Customs agreed that seizures are down. Mary Meier reported that seizures are down on all airlines nationwide. Maureen Maurer said that the lighting system in Calli had been changed which might explain the decrease.

John Reddin reported that there had been no arrests made so far but they are coming soon. He is working constantly with Tom Dowd and the results will show in about nine months. Mike Koncir also stated that the 1999 figures are going to be a lot better. John said the food service carts are a big issue. David reported that American Airlines has a new catering cart coming out in a week or two. The carts are very thin. The Office of Investigations has been working on the internal conspiracies for two years. David said that American Airlines is ready to make a media splash for arrests made. He wants to see these guys arrested.

Mike Ginn reported on his recent trip to Guayaquil, Ecuador. While he was there, he made an unannounced visit to the American Airlines facility. He said that the food service security measures at American Airlines were pretty good. He was impressed. David stated that the catering procedures are a big concern with American Airlines and he was glad that Mike look at their procedures while he was in Guayaquil.

John Reddin asked AA what their notification process is if a seizure is made in Cali. He would like a fax of when a seizure is being made. It was agreed that Carol from American Airlines will fax Mike Ginn the seizure information and Mike will then notify the other Customs offices.

3/25/99 UPDATE: AA reported that there have been no seizures so far.

It was agreed that Maureen would send her reports to Mike Koncir on the Internet. Mike Koncir will try and send the file to Mike Ginn and Mary Meier through cc:mail.

3/25/99 UPDATE: Maureen said reports haven't been done yet.

5/12/99 UPDATE: Maureen reported that there has been very little drug activity. She faxed Mike Koncir the information.

7/22/99 UPDATE: Maureen reported that next month she will send the reports to Mike Koncir and John Reddin via the Internet.

Mike Koncir and John Dennis recommended that the SPS continue as long as there are action items and issues to discuss. Headquarters also wants to know the results from OI efforts that should show in about nine months. The Team agreed to continue the SPS.

8/5/98 - NEW ISSUE REQUIRING DISCUSSION:

Mary Meier stated that the Customs Inspectors are frustrated. At a recent Town Hall Meeting held by the CMC Director and NTEU, the Customs Inspectors said they were being harassed by AA Security Agents and AA Supervisors when they were x-raying loose load cargo and bags. Delays are being blamed on Customs because we x-ray. Recently, Mary received two phone calls on a Sunday because Customs was being accused of delaying the plane leaving. Customs Inspectors are constantly being challenged. Several AA Security Agents and AA Supervisors are saying Customs can't x-ray because there is an agreement with Mary Meier. An Outbound situation occurred last Sunday when Customs was x-raying bags for currency. The AA ramp guys stopped loading bags and then Customs was told by the AA managers that Customs was slowing things down. It appears that the ramp guys want Customs to stop looking at bags. David wanted to find out what is different. Mary told him that AA Security has been more aggressive with the Customs Inspectors within the last month. Previously, Customs has never seen the security people say anything. Several Inspectors have been threatened by AA Security that they will call their supervisors or Lynn Gordon because Customs is causing a delay. There are more phone calls from AA to Customs; Mary received two calls yesterday. Tom thinks there is pressure coming from security to keep the flights moving. David said they are at their peak season and every airline is enjoying a fruitful season. Passengers in wheelchairs are a problem for Customs which can add to the delay. Mary suggested AA look in to their procedures to see if they can be improved. David is very concerned about this recent issue. He will talk to Ric and Jeff Heh to hear their side of the story. Tom believes the union is delaying the process. If they slow it down, they might get overtime. Also, AA ramp is penalized if there is a delay so they blame Customs. Maureen suggested that the Customs supervisor contact the retired police officers when they see the ramp people stop working or they have problems with AA security. Tom said he will put out a memo to his retired police officers to go out and observe what is going on. Mary said she would want only supervisors contacting the retired police officers. Mary will notify her Inspectors of this new procedure.

3/25/99 UPDATE: David asked if there were any more problems being encountered by Customs regarding the "Outbound" security people. Mary told the Group that several issues regarding American Airlines had been raised by the union in Miami to the Commissioner at a recent town hall meeting. Mary reported that things are smooth on the inbound side. The mechanic issue had been resolved over a year ago. Mike reported that the mechanic issue on Sundays has improved. Mike said that a new female employee working on AA security was brusque. David and Larry were not aware that a female was working on AA security in Miami. David will look in to it. David said that Mike Koncir is preparing a position paper on AA. Jeff said that AA wants to know if AA might need to get another aircraft.

On July 30, 1998, Maureen said she received a call from Ric saying that Customs Inspectors were harassing AA Security Agents on Mexican flights. Inspectors are asking for a CET package with a manifest and airway bills. David said the Mexico issue surfaced last year in one of our meetings and Maureen put together a procedure for AA to install a Level 2 security in locations coming north bound. David sent a message to his General Managers telling them to cooperate with Customs on this issue. Apparently, new Customs Inspectors were looking for a CET package but there really isn't a package per se for CET on Mexican flights. There are documents but not a package and Inspectors are looking for a package. AA never considered Mexican flights as international.

Both David and Mary agreed that there are less seizures on AA recently while seizures have increased on other airlines.

3/31/98 - MEETING DISCUSSIONS:

Jaime Giertz introduced himself as an American Airlines Systems Engineer with the Wide Body Aircraft Engineering Division in Tulsa, Oklahoma. He said that AA is considering doing some reengineering or reconfiguring of their aircraft in order to make it easier for Customs to do their job. AA wanted feedback from USCS as to whether it would help them. He stated that the decompression panels have a lot of use on them and he realizes that the containers do most of the damage. He wanted to know what USCS is looking at and are there any particular spots USCS goes to, specifically in cargo. Jaime showed a drawing of several panels. He said possibly one of the panels could have a window that would open. Customs could possibly put in mirrors. Canine would also benefit.

Customs Team members described the areas they look at in the following aircraft:

A300

Rear door accesses large area (AA calls it the blue room)
Under insulation, up on ledge
— Avionics compartment - Dope on a rope; suitcase in front
Shelves for boxes in front
Cargo compartment - slope between floor and wall; dog alerts; many screws
Row 18 Center Topside - panel 3'x18"; 4 special headed screws - Mike told Jaime that a clear panel of plexiglass would be helpful. That area has produced huge seizures. Mike said the AA mechanics hate to open and close that panel.

727

Front belly - air conditioning panel has lots of room; has quite a few screws and some are always missing; suitcases full in past; panels always in real bad shape.
Ceilings cut to insert dope (1 kilo) and taped shut; lining is real thin; slit can be cut easily
Outside - 6-7 access panels; rear stairway; wheel wells
Water tank valve - kilo taped to opening flap
Under the life raft; lots of problems for USCS; difficult to lift the life raft

757

Belly doors - access panel to flight data recorders; have 15-20 screws
Rear belly - triangle or square zipper flap with screws; in very back section in rear of tail
Rear galley speakers - 2 push pins; push pins are best for Customs
Above stewardess seats - very accessible; can be viewed by standing on jump seat; often used
Fishing wire and hooks were used to connect to window frame

Passenger cabins

Very accessible

Jaime stated that if a plane is taken out of service prematurely, the mechanics in Tulsa have found drugs in side wall. Mike Ginn stated that he has never pulled a side wall down, but would call a mechanic if dog alerts. Rudy Ramirez said that in high risk cities in South America where there is an overnight, AA security checks behind the panels when the plane arrives, takes panels down, leaves them off all night and mechanic puts them back on in the morning. In Ecuador,

panels aren't opened; AA checks seals with serial numbers to see if the seals have been removed from the panels.

USCS invited Jaime to accompany them on the planes to get a better idea of what USCS is looking at. It was agreed that Jaime would go with USCS on Thursday, April 4, 1998, around 4:30 AM. Mike has slides he will show Jaime. Jaime will take a camera.

Discussion/Action Plan:

5/28/98 - American Airlines will set up with Customs regarding going to Tulsa and Alliance. Scott Lowen also wants to go. Gonzo will ask Mary Meier when is the best time to go.

8/5/98 - David thinks its a good idea for Customs to go to Tulsa and Alliance. Maureen will check with Jamie as to the status. David wants a meeting set up with Jamie.

2/10/99 - This idea of Inspectors going to Tulsa is still in limbo. David said it is important for the Inspectors to go to Tulsa to provide input. Jamie Giertz wants his Team in Tulsa and the Inspectors to brainstorm some solutions. Maureen reported that American Airlines is going to renovate all of the interiors soon so the Inspectors should plan on going before then. Mary Meier suggested to David that American Airlines also look at their maintenance records for repeated replacement of parts. John Reddin stated that either Scott or himself would go with the Inspectors to Tulsa. Mary Meier said that Nicole, Mike and herself would probably be the ones to go to Tulsa. Maureen recommended that the next SPS Team Meeting be held in Tulsa or Dallas immediately following the Inspectors visit to Tulsa. Mary Meier asked John Dennis if there was SPS funding available to cover their visit to Tulsa. John Dennis said there may be money once they receive their budget. John Dennis and Mike Koncir told Mary to follow through with the plans.

WHAT/HOW	WHO	WHEN
Contact Jamie regarding when the Inspectors could visit the Tulsa facility. Notify Mike Ginn of the dates. David was looking at the week of March 22, 1999 as being good for him.	David/Maureen	3/10/99
Set up next SPS Team Meeting in Tulsa or Dallas.	David/Maureen	3/10/99

3/25/99 UPDATE: Nicole and Mike visited American Airlines facilities in Tulsa and Alliance in order to provide feedback for the reengineering or reconfiguring of their aircraft. Nicole and Mike provided the following trip report:

On March 22, 1999, they flew to Tulsa. On March 23, 1999, they met Dave Divan at the Tulsa facility. They met with Jamie Giertz, Systems Engineer and Al Zepf, Manager to discuss the A300. They discussed changing the panel underneath row 18. AA was unaware of this panel because they had already converted 10 planes which fly transatlantic. These planes were changed to add a business class resulting in the panel being sealed off. This seemed like an easy and feasible solution. They discovered AA owns a total of 35 A300's. Only 25 would need this enhancement. A picture of the row 18 panel was shown to the Group.

They also looked at the bathrooms and ceiling panels where Customs normally finds contraband.

The mechanics showed them these areas as well because they have found contraband in Tulsa. They also looked at two panels in the rear galley and were able to ascertain how they should inspect the area. They also looked at the blowout panels and discussed why and how they are damaged.

They also inspected the vapor barrier near the fuel tanks. This barrier prevents fuel fumes from getting into the cockpit and cabin areas if there is a leak. The mechanics pointed this out because they have had four cut recently. This may be used to smuggle and is a difficult area to access unless the plane overnights. It is extremely costly to replace these.

Next they inspected the 727 aircraft with Jeff Jones, Manager of Airframe and Systems Engineering. They examined the A/C panel in the belly and discussed alternatives to the current panel which has 24 pop-screws. A clear panel is difficult because it may get scratched and impair the clarity due to the heavy traffic of baggage. A hinged door was suggested by Mr. Jones. He said it would take a month to plan and another month to obtain funding. He also informed them that it would take about one year to install once installation began. AA owns approximately 76 of these aircraft and will begin phasing them out around 2004. No replacement aircraft has been named. A picture of the front belly air conditioning panel was shown to the Group.

On March 24, 1999, Nicole and Mike flew to Dallas and met David Divan. They drove to Alliance and examined the 757. The 757 will start having light maintenance in Tulsa shortly because the 777 will be maintained at Alliance. They met with Jamie Burnett, manager of Production Control and Ron Pekny, Engineering Specialist. The two areas they looked at were panels in the bellies. Ron said flammability and impact resistance were necessary for these panels. He said they could look at putting in windows within the panels but they would have to find the right material. One mechanic mentioned a product called Lexan. However, this could be a problem because Lexan is heavy. They discovered that AA owns 100 of these aircraft and are expanding their fleet. Pictures of the front belly and rear belly were shown to the Group.

A group discussion followed their trip report.

Customs decided to request reworking of the hatch into the cavity under row 18 of the A300's WHICH ARE NOT IN SERVICE TO EUROPE (those have been reworked to add a business class, changing the configuration near this area, and the panels have already been altered to close much more permanently and securely.) Customs also decided to request reworking of the access panel into the air conditioning unit in the belly of the 727. On a panel of concern in the 757, based upon the information provided by engineers regarding aircraft integrity, it was decided to abandon the idea of seeking to change it.

David was concerned that the cavity under row 18 was not on AA's checklist. David instructed Jeff to find out.

5/12/99 UPDATE: Ric reported that Jeff told him the cavity under row 18 is being checked by AA.

Mary requested AA's records on the four instances where the vapor barrier near the fuel tanks had been cut.

The Group brainstormed for solutions to the areas of concern stated above. Criteria such as

weakening the structure of the plane, meeting flame penetration requirements, meeting FAA requirements, saving money for American Airlines (replacement parts), cost of modification for American Airlines and saving time for Customs were used for choosing the best solutions. The Group had a conference call with Jaime Giertz to clarify issues. The Group reached consensus on the following:

1. Recommendation for the A300, Row 18 Panel: For 25 different aircraft that haven't been modified, use recessed latching device in place of screws.
2. Recommendation for the 727, Front Belly Air Conditioning Panel - For 76 aircraft, replace current fastening system - 1) top hinges with bottom latches, or 2) hinged door - top or side.
3. No changes recommended for the 757, Front Belly and Rear Belly.

Nicole and Mike said they were treated well, saw a lot, and learned some useful information. Mary requested to send more inspectors to Tulsa and/or Alliance in the future for training purposes and a better understanding of the aircraft. David expressed concern about wearing out his welcome mat there; however, he will pass along our request to the managers.

Maureen requested Customs send her more copies of the pictures that Nicole and Mike had taken in Tulsa and Alliance so she could send them out to the field.

WHAT/HOW	WHO	WHEN
1. Prepare a detailed list of recommendations and benefits to the A300 and 727 aircraft. Include pictures if applicable. Fax to David.	Mike	5/21/99
2. Prepare letter to Tulsa regarding recommendations and benefits to the A300 and 727 aircraft. Request timely response within six weeks.	David	6/11/99
3. Check with Jaime regarding the number of instances where the vapor barrier near the fuel tanks on the A300's had been cut. Provide copies of AA's records to Mary Meier.	Maureen	6/11/99

7/22/99 UPDATE: The Group received responses on the two recommendations made to the A300 and 727 aircrafts. The first response, dated July 22, 1999, was addressed to David Divan from Jamie Giertz regarding Recommendation #1 for the A300, Row 18 Panel. The Group had recommended for 25 different aircraft that hadn't been modified, to use a recessed latching device in place of screws. In response to the request, Jamie suggested the following alternative: AA would rather remove the entire floor board assembly, which includes the access panel, and replace it with a new floor board without an access panel in it. By doing this, the floor board would be immovable without the removal of passenger seats. Ten of the 35 AA aircraft are configured this way and access to this area for maintenance is rare. The Group agreed with the alternative suggestion made by Jamie. David will respond to Jamie stating the Group agrees with the alternative suggestion and request time frames for beginning and completing the

modification.

The second response, dated July 20, 1999, was addressed to Jamie Giertz from John Sutrick and Jim Dietrich regarding Recommendation #2 for the 727, Front Belly Air Conditioning Panel. The Group had recommended for 76 aircraft that the current fastening system be replaced with 1) top hinges with bottom latches, or 2) hinged door - top or side. On July 13, 1999, Jim Dietrich contacted Nicole and David to get a better understanding of Customs' request to install quick access doors. From Nicole's description, Jim understood that the primary concern is with the B727 forward air conditioning compartment wall. This wall is installed with approximately 20 fasteners and requires some time to remove the panel for inspection in the A/C compartment. The primary concern is that whenever Inspectors find one of the attachment screws missing or not properly installed, it alerts Customs to a possible security breach and Customs must remove the panel for inspection. Jim said it is a fact that screws may be found loose or missing just from normal wear and tear. Jim told Nicole that he would look at the possibility of installing a quick release door either in the center panel or on the side panels. The letter states that Jim reviewed the installation of the A/C access wall and provided the following results:

1. The panel is already installed with quick release (1/4 turn) fasteners. The fact that some fasteners may be loose or missing drives the Inspectors to remove the entire panel.
2. The A/C wall acts as a critical element in the event that the aircraft experiences a rapid decompression. All three panels of the wall are a heavy construction with corrugated panels and reinforcement channels installed on the back side of the panels. The panels on either side of the center panel are equipped with blow out panels which are designed into the airplane to quickly relieve any pressure variation between the upper cabin and the cargo compartment. This decompression system must be intact to prevent buckling of the floor beams during a rapid decompression situation. The center panel is heavily reinforced to prevent it from collapsing during a decompression and causing further damage to the systems contained in the A/C compartment.
3. The design of this panel with corrugated reinforcements makes it very costly to design a quick release door.
4. A quick release door must also be properly sealed because of the FAR requirements for fire and smoke containment in the cargo compartments. In fact a modification to this panel would require a major STC and would probably require re-certification of the "Fire and Smoke" STC modifications recently installed.
5. For the above reasons, AA Engineers do not recommend any modifications to this panel.
6. However, to provide relief for the problem of missing or loose fasteners, AA Engineers will issue inspection requirements to the field "B" check program to do a check for condition of the screws in this panel. The AA Engineers hope this will cut down on the number of times that the panel must be removed for inspection.

A Group discussion followed. The Group agreed to send a rebuttal letter to the AA Engineers asking that they reconsider their decision to not recommend any modifications to the panel. Customs will provide pictures of the panels on all 727 aircrafts to be included with the rebuttal letter. Mike Ginn stated that the Inspectors will continue to tie up AA's mechanics to put screws

in the panel.

In the July 22, 1999 letter, Jaime also responded to Customs' request for copies of AA's records regarding the cut vapor barrier shrouds on the forward side of the A300 center fuel tank. AA can recall having 3 (possibly 4) occurrences in the last three years. To find the actual documentation, a search of the non-routine paper work must be conducted for each aircraft in question. AA doesn't think they know exactly which aircraft were found with the shroud cut and a search of the MBV paper work for the last three years would be a monumental task. AA doesn't believe this is a chronic problem for them.

WHAT/HOW	WHO	WHEN
1. For Recommendation # 1 (A300), prepare letter to Jamie Giertz stating that the Team accepted his alternative recommendation. Request time frames for beginning and completing the modification.	David	9/13/99
2. For Recommendation #2 (727), take pictures of panels on all 727's aircrafts. Send pictures to David Divan.	Mike/Nicole	8/9/99
3. For Recommendation #2 (727), prepare rebuttal letter to Jim Dietrich and John Sutrick. Include pictures of the panels taken by Customs.	David	9/13/99
4. Look at Checklist on outbounds to see if panel is looked at. If not, add to Checklist.	Ric	8/9/99

1/29/98 NEW ISSUES REQUIRING DISCUSSION:

Mary Meier asked AA for access to the top parking lot. Rudy Ramirez said all he needs is the Metro-Dade Control numbers to put in their computer. Mary Meier will write Rudy Ramirez a letter requesting access with the control numbers identified. AA requested that Customs notify AA Security when a special operation is being done.

George Dickinson notifies AA of seizures. AA asked for feedback on their seizures. Mary Meier told AA to call Mike, Kim or Dave in the future for feedback.

Mike Ginn asked AA what Customs should do if they see cleaners pilfering something. AA said for Customs to notify AA Security if they see it happening.

Alternative Numbers 1 and 8 Combined:

Ensure ramp access to AA aircraft is controlled to authorized personnel only. (Those who have a need to be there to perform a function for that flight) and record names of those coming in contact with aircraft in Miami and foreign to include aircraft where violations have occurred.

Discussion/Action Plan:

7/29/97 - American Airlines currently has a team that conducts spot checks of arriving flights to ensure that crew working the flight is assigned. During airport operation of flight, the number of persons working a particular flight could number +/- 50 people, including contractors. With flights arriving in Hub/peak fashion, the flights are just too numerous, and the possibility that an employee may have to move from flight to flight to distribute bags, etc., might make recording 100% of all persons at all flights impossible and not cost effective for the data collected. Customs, too, conducts sweeps of the areas and pulls ID cards from unauthorized persons. The problem is that they do not know when an employee is not authorized or assigned to a particular flight.

WHAT/HOW	WHO	WHEN
Conduct Spot-Checks of persons accessing aircraft or in area of arriving aircraft. 9/18/97 UPDATE: AA is visible, no one has been found.	American Airlines Tom Dowd	7/29/97 Ongoing
Pull ID's of those persons at the aircraft when not authorized (need to contact AA to determine Assignment/ authorization) 9/18/97 UPDATE: No occasion has occurred, no ID's have been pulled.	Customs/Martins AA/Dowd	7/29/97 Ongoing
Need to know requirements for pulling and keeping Customs Seal / ID card to customs areas. 9/18/97 UPDATE: Requirements obtained and discussed.	Customs/Martins	8/1/97 Completed
Identify and investigate suspect persons within AA who control assignments, schedules etc. 9/18/97 UPDATE: Procedures in place between AA & USCS/OI.	AA Dowd USCS/Lowen	7/29/97 Ongoing
Record names of persons on or near aircraft at time of discovery of narcotics detected onboard. Follow-up with list of those assigned from AA 9/18/97 UPDATE: Mary will establish procedures for USCS, AA will provide their assignment list to CET.	USCS/Martins USCS Lowen AA/Dowd	7/29/97 Ongoing
12/16/97: Include USCS Sealing Office in 3rd Party Training. 1/29/98 UPDATE: Third party seminar held 1/8/98 for approximately 40 individuals. Ongoing training is being done by USCS. 12/16/97: No additional actions necessary - implementation has taken place.	USCS/Mike Ginn	1/8/98

9/18/97 UPDATE: All USCS inspectors have been trained on ID reg's. If seals are pulled airline is fined \$1,000 per instance. Assignments to aircraft are being monitored by AA, if a person is found, a report is written and passed onto Dowd; action is being taken against employees whose ID's are pulled for Customs security violations; 12 citations during past year, none thought to be drug-related. *AA will notify OI/CET of ID violation(s) against AA - USCS to coordinate with AA Security on penalties.*

12/16/97 UPDATE DISCUSSION: \$34,000 in fines have been issued for ID violations. There is a lack of understanding of the ID policies. The ID issue is not just a CET issue, all inspectors are involved in penalty issuance. Including the USCS Sealing Office into 3rd Party training, may help improve their understanding of the ID policies.

1/29/98 UPDATE/DISCUSSION: COMPLETED.

***PROCEDURES TO FOLLOW WHEN A DETECTION OF UNAUTHORIZED
- PERSONS AT AIRCRAFT IS MADE:***

1. USCS to notify American Airline International Security Personnel stationed at plane side; or, by telephone at 526-0794 or 526-7973.
2. American Airlines Security will contact appropriate American Airlines department and verify if the person is authorized to be at aircraft.
3. If the person is not authorized to be at the aircraft, the ID card will be pulled, and the employee will be escorted from the area.

Alternative 10 - Full access to every part of Aircraft to U.S. Customs

Discussion: CET in Miami has historically searched aircraft from all airlines, opening panels and compartments that required the use of basic hand-tools. Recent changes in the policy for American Airlines only, caused by damage caused to an aircraft in Los Angeles, requires that CET contact an AA mechanic before opening any compartment requiring a tool. Concealment of narcotics on American Airlines as evidenced in past seizures, indicates that the smuggles do conceal narcotics behind these panels and that the possibility exist that AA mechanic are involved in the smuggling activity. Per an agreement with AA, mechanics are supposed to be at the aircraft upon arrival of flights from specific cities identified by Customs as High risk. These mechanics are not at the aircraft upon arrival and often take too long to arrive, causing the CET inspectors to tire of waiting and moving on to the next flight. These delays could be intentional by AA mechanics to thwart Customs search of the aircraft. American Airlines has cited the requirement to have a mechanic present as an FAA safety regulation. Customs argues that the mechanic does not need to be there to open the panel, simply to close and secure it. Damage to aircraft which supported AA's decision to initiate such a requirement upon Customs may have been caused by Mechanics who were fearing lay-off from AA and damaged the aircraft themselves to justify having mechanics on hand, those preventing the lay-offs.

Action Plan:

WHAT/HOW	WHO	WHEN
AA mechanics must be at high risk flights upon arrival (High Risk designated by Customs) 9/18/97 UPDATE: Delays still exist waiting for mechanics, they are not always there, USCS will continue to track; AA changed the security mechanics shifts to help address the late night flights problem, and hired 8/9 mechanics to work solely with USCS. Continue to monitor.	AA/Dowd	7/29/97 Ongoing
Customs Counsel determination on Customs access to aircraft compartments 9/18/97 UPDATE: Scott Falk, USCS Counsel led discussion concerning USCS broad access and search authority, and explained that the operator is responsible for the air-worthiness of the aircraft after USCS inspection & search.	USCS/Martins	9/1/97
Need to know which FAA regulations prohibit access to panels - conduct research 9/18/97 UPDATE: AA is seeking further clarification. Contact FAA (Crow) and manager of AA safety, and get answer to search questions prior to special emphasis meeting.	AA/ Dowd AA/Divan	9/1/97 9/30/97
Deal with Internal resistance from Mechanics		Ongoing
Continue status quo on aircraft inspections.	AA/CET	Ongoing

Action Plan for #10, continued:

WHAT/HOW	WHO	WHEN
Set up meeting for search issue. (See "Parking Lot")	AA Ric/USCS Martins	9/29/97

9/18/97 UPDATE/PROBLEMS: The legal issues are still pending (Is a mechanic required?). Is this a policy issue or legal issue? Delays occur waiting for mechanics. Mechanics have advanced knowledge of Customs inspection. *A separate, single-focus, meeting will be held to discuss this issue (see "Parking Lot" notes).*

12/16/97 UPDATE/DISCUSSION: After the 12/4/97 sub-group meeting, Ric spoke with Bill Crowe, FAA. Crowe is still not in total agreement with USCS Counsel; he states Customs can open panels, but mechanics must close. AA's concern was with opening the overhead panels and cockpit areas, as well as bellies of the air bus. AA felt that mechanics should be present for cockpit search. Members of the sub-group conducted a walk-thru of aircraft last week, and USCS demonstrated to AA how the searches are conducted. It appears, based upon the walk-through, that there may have been unnecessary concern about the searches. The group discussed the solution of devising procedures wherein USCS notifies AA of aircraft search; mechanic responds to meet USCS plane side; Inspector advises mechanic of which panels are open (need to refine the "how.") AA needs to consider reviewing/changing their internal security search procedures. The group reached consensus on the "Procedures for USCS Inspections."

The group identified some potential problems which could arise, as a result of the new procedures, which will be dealt with if/when they arise:

- Response to communication with mechanics (non-Level One).
- Concern that this may result in a reduction of the mechanic workforce.
- Cultural resistance from USCS inspectors and AA Mechanics Union.

PLAN FOR IMPLEMENTATION OF TEST PERIOD:

Ric Arner will review this plan with the A.A. V.P., Miami Hub, to obtain approval; he, will then notify USCS, Mary Martins; and the test will begin.

Upon approval by AA, the test period will begin on Monday, December 22, 1997 and will continue through Friday, January 30, 1998.

The group will review the Procedures and test period, and will discuss implementation during their January 29, 1998 meeting.

Add to the Checklist:

- A line for Inspector Badge Number;
- A line for A.A. Security /Mechanic Name and Employee Number.

RELATED ACTION ITEMS:

WHAT/HOW

WHO

WHEN

Explore scheduling AA training of USCS inspectors on opening of aircraft panels. Discuss with John Rabozzi, to see if this can be done this week, during the USCS/ASU 12/18/97 meeting.

USCS/Mike Ginn

12/17/97

1/29/98 UPDATE: Mike Ginn hasn't met with John Rabozzi yet. Contact John Rabozzi.

AA/Arner

1/30/98

Advise Mike Ginn of John Rabozzi's response. Mary Meier will put on agenda at all hands meeting on 2/17/98 if John Rabozzi can handle the AA training of USCS Inspectors. Training could be small groups.

AA/Arner

2/2/98

Contact Legal Dept. regarding video for training purposes.

AA/Maurer

2/3/98

3/31/98 UPDATE: Group agreed that the SubGroup should address this issue. Sub Group needs to draw up an outline of what USCS wants on video. Make it an agenda item for next Sub Group meeting.

USCS/Mike Ginn

At next Sub Group Meeting

5/28/98 - Gonzo did not know whether the sub group addressed this issue or drew up an outline. Gonzo will check with Mike Ginn. Gonzo also said he thinks a video is being worked on. He will check the status.

USCS/Gonzo

ASAP

8/5/98 UPDATE: David would like to see this happen. It is a very positive thing. Most pilots are unaware of what is going on around them.

Coordinate presentation - Tom will talk to Chief Pilot and Union in Miami about Mike giving a 15-20 presentation to pilots here in Miami. He could test it on 10-15 pilots to get their reaction. Maureen suggested Tom ask for volunteers. Mary suggested that AA and USCS come up with a script to use. AA Security should be on part of the video.

USCS/Mike Ginn
AA/Tom

Within 2 weeks

2/10/99 UPDATE: Tom reported that the Chief Pilot was receptive. He asked

Tom to follow up with an E:Mail message.
 The Chief Pilot didn't respond to Tom's
 E:Mail message. David said that AA would
 support the idea and use it in all their
 pilot's classes.

Draft a script outline. Send the draft to John
 Dennis.

USCS/Nicole
 AA/Tom 3/10/99

Provide pictures to Nicole from the next food
 cart seizure to be included in video.

John Reddin After next
 seizure

Submit draft to the appropriate Committee
 in Headquarters. (Mike Koncir explained the
 Commissioner's concerns regarding Customs'
 image.)

John Dennis 3/17/99

Obtain approval from AA's Corporate
 Headquarters to use video.

David 3/17/99

3/25/99 UPDATE: Draft outline was distributed to Group.

5/12/99 UPDATE: Fax copy of latest script to David.

Mike 5/21/99

Show draft outline to AA Corporate Headquarters and
 provide comments to Nicole or Mike.

David 6/11/99

Forward revised outline to Mike Sheehan and John
 Dennis after receiving AA's comments.

Nicole/Mike 6/18/99

Forward outline/script to Publication Review Board,
 Headquarters.

Nicole 6/25/99

7/22/99 UPDATE: Nicole spoke with Richard Greene, Visual Services Branch, Headquarters. He
 recommended that the video be made for national distribution and that it be no longer than 13
 minutes. He said he would be available in September or October and the cost is approximately
 \$15,000 - \$20,000. Richard asked Nicole to send a memo to him with an outline of the script. Mike
 Koncir said Outbound should be included in video. Mike Koncir asked AA if they will help with the
 video. Ric and Tom said they didn't see a problem with AA helping. Mike Koncir will contact
 Richard Greene regarding the video and determine if SPS funding is available for this project. He
 also wants to make sure the procedures are the same at all ports.

Prepare memo to Richard Greene with outline of
 script. Send copy of letter and script to Mike Koncir.

Nicole 9/13/99

Contact Richard Greene regarding the video.
 Determine if procedures are the same at all ports.
 Determine if SPS funding is available.

Mike Koncir 8/23/99

Report back to Mary Martins on
 go ahead for Test Procedures.

AA/Ric Arner By 12/17/97

1/29/98 UPDATE: Go ahead given.

Completed

After go ahead is received from A.A.,
brief ASU inspectors.

USCS/Mary Martins By 12/18/97
(After go ahead)
Completed

1/29/98 UPDATE: ASU Inspectors briefed.

Update CET shift reports/eliminate
backlog of input.

USCS/Mary Martins By 12/27/97

**1/29/98 UPDATE: Reports were updated
and are being kept up to date.**

Ongoing

Brief Ken Davis, AA, on the new
Test Procedures for Inspection of
Aircraft.

AA/Tom Dowd By 12/19/97

**1/29/98 UPDATE: Ken Davis was briefed
and had no objections.**

Completed

Explore development of awareness
training for pilots, flight crews,
regarding Customs and Security
searches.

AA/Ric Arner By March '98
USCS/Gonzo Reinoso

1/29/98 UPDATE: Continue to explore.

AA/Arner By March '98
USCS/Reinoso

1/29/98 UPDATE/DISCUSSION: AA is still exploring. AA doesn't want to do training in a formalized classroom. AA wants more of a familiarization issue given to the pilots. USCS can adjust the training to whatever AA wants. AA still wants some form of awareness. AA prepares materials for the pilots during their retraining. Some AA pilots don't know why Customs is there on the plane. A video may be good because it could be standard. Mike Ginn suggested training the Miami pilots first with a 15-20 minute video of why Customs is there. Retraining of pilots is done in Dallas. There are approximately 1200 pilots and 2800 flight attendants in Miami.

PROCEDURES FOR USCS INSPECTIONS OF AMERICAN AIRLINES AIRCRAFT

1. Customs targets American Airlines flight for search (from flight schedules, tips, random, etc.)
2. USCS notifies American Airlines of aircraft to be searched:
 - Notify on-site A.A. Security Personnel to have a mechanic respond;
 - If no AA security personnel, inspector will call A.A. Ramp Operations or Maintenance Operations to have a mechanic respond:

A.A. Ramp Operations: 526-7973
Maintenance Operation: 526-5037/3507
3. Inspector searches the aircraft, with the exception of the cockpit, which will require the presence of a mechanic in order to open the panels.
4. Inspector completes the checklist to identify the opened panels.
5. Inspector gives the completed checklist to the mechanic; if no mechanic is available, inspector notifies A.A. (526-7973, Ramp Operations) to have security Agent respond to obtain checklist from inspector. Inspector obtains name/employee number of person who receives the checklist, and annotates on the USCS shift report.
6. Mechanic closes panels.

1/29/98 UPDATE/PROBLEMS DURING TEST PERIOD: AA has a problem with the Checklist. Several mechanics have refused to sign it. AA mechanics don't want a Checklist. There is confusion about the Checklist when USCS Inspector meets the mechanic. Mechanics are confused whether to take the Checklist or not. John Rabozzi told his people to not accept the Checklist. Mechanics fear FAA may misinterpret the Checklist if they see it. Arthur Torno doesn't want another piece of paper out there. The Checklist asks for AA Security/Mechanic Name and Employee Number. USCS is not asking mechanics to sign Checklist; AA was requiring a signature. Mary Meier stated that USCS is going to implement this procedure with all airlines in Miami. An incident occurred where an Inspectors handwriting was illegible but Customs wasn't notified for several hours. Mary Meier recommended that the subgroup meet soon to discuss the Checklist issue. AA initially requested the Checklist. Ric Arner wasn't sure where the Checklist goes after the Inspector gives it to the mechanic. Team members recommended to attend Subgroup meeting are Michael Ginn, Ozzie Martin, Gonzalo Reinoso, Ric Arner, David Divan and John Rabozzi. Ric Arner/John Rabozzi will bring to the subgroup meeting a copy of the latest version of the Checklist. Mary Meier stated that Customs will continue to fill out the Checklist and annotate on their shift report.

3/31/98 UPDATE: Members of the Sub Group met on February 6, 1998, to discuss the issues concerning the checklist procedures established by both parties. Larry Wansley, AA, HQ, Security, was present. He said the group should get together with the mechanics to fine tune the checklist. The group decided to meet on February 9, 1998. John Rabozzi agreed to contact Mike Ginn by February 9, 1998, to arrange the time of the meeting. John did not contact

Mike. Mike called John on February 9, 1998. John said he forgot to set up the meeting and asked Mike if the meeting could be rescheduled for February 11, 1998. Gonzalo Reinoso was not available so the meeting was rescheduled for February 12, 1998. John Rabozzi did not show up for the meeting; a mechanic manager showed up in his place. Eight mechanics from AA also attended the meeting. USCS briefed the mechanics on what a SPS was. When the group tried to go out to the plane, the mechanics got into an argument over FAA regulations, etc. The mechanics told the sub group that they had never been briefed by AA management regarding the checklist. Mary Meier told the Group that since this issue has not been resolved USCS has been prevented from implementing the checklist procedures with other airlines. Maureen said she would address this problem with Larry Wansley.

Related Action Plan:

WHAT/HOW	WHO	WHEN
Contact Larry Wansley regarding mechanic issue	AA/Maureen	4/1/98
Provide status/update to Mary Meier	AA/Maureen	by 4/10/98

5/28/98 UPDATE: Gonzo reported that two meetings had been held. On 4/28/98, SCI Reinoso, CI Martin and CI Hurley met with Luther Brewster, Managing Director, John Cardinale, Aircraft Maintenance Manager and Lee Harris, Maintenance Manger, American Airlines, to discuss the mechanic issue. On 5/6/98, another meeting was held. American Airlines was represented by 6 of their 10 aircraft mechanics assigned to international flights as well as Lee Harris, Regional Manager for Aircraft Maintenance and John Cardinale. Customs was represented by SCI Reinoso, CI Rick Porrata, CI James Hurley, CI Jen Holzman, CI Debbie Blanchette and CI Ozzie Martin. Topics of discussion were: Officer Safety, CET/ASU Checklist, Cooperation and Level of Authority by US Customs when searching aircraft and cargo. Checklist is still being used as originally written. Gonzo told AA that Customs will be looking at several extra flights. Ric Arner asked for the flight numbers. They are Level 1 flights. Gonzo will fax the information to Ric. Mary stated that Mike Koncir, Headquarters, will be sending AA a report on the seizure of cocaine found in the coffee.

Alternatives 12 and 39 - Use closed circuit television and surveillance cameras more efficiently, and install cameras on aircraft

Discussion: Cameras on board aircraft require notification to FAA that they are installed and cannot be connected to aircraft wiring system. Portable cameras are subject to theft if discovered in foreign airports etc. Need to have more information on how best to approach the use of CCTV and surveillance cameras

Action Plan:

WHAT/HOW	WHO	WHEN
Explore the possibility: FAA restrictions Install vs portable How/Where etc Which routes etc	AA/USCS Dowd/Lowen Martins	Meet by 9/1/97
9/18/97 UPDATE: This is still a possibility but will utilize this alternative when there is a source.		As needed
Other Technology use: AA Vehicles used by Customs (liability) Diversions	AA/USCS Dowd/Lowen Martins	Meet by 9/1/97
9/18/97 UPDATE: Further research is necessary.	Dowd	by 11/6/97
12/16/97 UPDATE: Pending for next meeting; Discussion: Utilization of AA vehicles requires an indemnification from USCS. OI/USCS needs to explore this.		
Brief OI on this matter.	Mary Martins	by 12/19/97
1/29/98 UPDATE: Mary Meier said there is no need for it. It isn't a practical idea and won't be pursued by USCS.		

Alternative 15 - Conduct special operations on overnighing aircraft parked on ramp at MIA (surveillance, searches, boarding, K-9 sweeps, other agency)

Discussion: The group discussed the necessity to conduct operations on these aircraft once they became domestic. It was believed that most of the aircraft stationed over night were arriving from domestic points. The possibility that AA conspirators are removing narcotics which arrived on and international leg of a flight after it returns from domestic legs does exist. Possible resistance from Metro Dade and DEA because of domestic issue. American airlines does not see a problem and will authorize access to these aircraft by Customs to conduct searches and or K-9 training.

Action Plan:

WHAT/HOW	WHO	WHEN
Research feasibility Aircraft routing 9/18/97 UPDATE: Short term	AA/HEH	8/7/97
Training of K-9 1/29/98 UPDATE: K-9 continues to conduct searches.	USCS/Martins (Meaders)	After 10/1 9/1/97
9/18/97 UPDATE: Due to end of fiscal year budget restraints, USCS cannot plan for any special operations until after October 1, 1997.		Pending
Obtain TDY resources to increase CET presence at AA aircraft through training. Need money (S.P.S.) for October-December. 1/29/98 UPDATE: Write special operation plan to Headquarters for SPS money to cover AA's SPS	Martins Hessler Mike Ginn	9/30/97 2/13/98

12/16/97 UPDATE/DISCUSSION: Revisit at next meeting - Pending the outcome of the test period for the aircraft search procedures. The Customs K-9 are being run on the aircraft - nothing has been found/no results. A.A. likes the activity - the more monitoring of the aircraft the better.

1/29/98 UPDATE/DISCUSSION: Mary Meier briefed AA on Customs reemphasis on their narcotics interdictions efforts on inbound flights. Beginning February 1, 1998, more flights will be looked at by Customs. It is a national six month initiative. Ric Arner stated that AA wants the USCS manpower to be there so there won't be delays. USCS will be trying some different things. Blitzes will be done all over South Florida. Mary Meier will be getting 15 new positions to increase the narcotics interdiction efforts on inbound flights. Mike Ginn and Ozzie Martin do not see any advantage to bringing other Inspectors TDY to Miami. It would slow the local people down. Local Inspectors could double up on shifts. A possibility is to bring in Miami Seaport Inspectors since they have some experience in narcotics. AA would also rather see people with experience. Mary Meier stated that manpower from other locations may not be available since blitzes will be going on everywhere. Mike Koncir, USCS, Headquarters, recommended to Mary Meier that she request SPS funding from Headquarters to cover AA's SPS.

Alternative 16 - (reworded) Furnish information concerning AA employees fired for narcotics violations to USCS office of investigations.

Discussion: Originally, alternatives brain stormed suggested that information concerning all employees fired from AA be supplied to OI prior to the firing. The reasoning being that OI may have an ongoing investigation of that employee that could be jeopardized if the employee were fired. To eliminate receiving information on employees that were being fired for non-related issues, the alternative was changed as above.

Action Plan:

WHAT/HOW	WHO	WHEN
AA notify USCS - OI of employees fired for any narcotics violation	AA/Dowd USCS/Lowen	7/29/97
9/18/97 UPDATE: This has been done and will continue.		Ongoing
1/29/98 UPDATE: AA will provide information if necessary. AA should notify OI of firings.		Ongoing
5/28/98 - UPDATE: Scott Lowen stated that AA continues to notify OI.		
2/10/99 - UPDATE: John Reddin reported that AA continues to notify OI.		
12/16/97 DISCUSSION: Such firings usually occur in connection with an arrest, and OI/USCS is usually aware. This is implemented and ongoing.		

Alternative 18 - Increase Customs Presence at arriving AA aircraft.

Discussion: AA believes the presence of Customs at arriving international flights would help deter the use of AA aircraft for smuggling. Customs relayed the information that resources are scarce and we cannot be at every flight. The possibility of conducting short term enforcement blitzes which allowed for the random and periodic meeting of every arriving flight during a brief period was discussed. Options such as TDY's, use of employees other local branches i.e., rovers, seaport, baggage inspectors, cargo etc was discussed. Mary Martins will further develop these possibilities.

Action Plan:

WHAT/HOW	WHO	WHEN
Develop action plan to address more Customs presence at arriving aircraft.	USCS/Martins	9/1/97
9/18/97 UPDATE: Due to end of fiscal year budget restraints, USCS cannot plan for any special operations or TDY's until after October 1, 1997.		Pending

12/16/97: PENDING

1/29/98 UPDATE: See update for Alternative #15.

Alternative 22 - Initiate Financial Investigations of suspected employees who are repeatedly near or around violated aircraft (aircraft where narcotics are found).

Discussion: AA employees, and other persons having access to aircraft may not have the means to live the lifestyle they do, (expensive cars etc.) The names of persons identified in the area of violated aircraft will be forwarded to OI for initiation of financial investigations, to include systems checks and progressively work up to full investigations including IRS etc. when warranted.

Action Plan:

WHAT/HOW	WHO	WHEN
Get info to OI	USCS/CET Rover's, etc.	7/29/97
9/18/97 UPDATE: Have not tried to cross-match. Names from the recent flight 960(MIA to DFL) will be forwarded to USCS. Will look at historical data.		Ongoing
9/18/97 UPDATE: Research seizures over last 90 days and identify possible AA for financial investigations - continue follow-up on all future seizures.	Mary/CET Tom - AA info for last 90 days	Report at next meeting 11/6/97
1/29/98 UPDATE: OI has some good cases going on.		Ongoing
5/28/98 UPDATE: Scott said this is ongoing.		
12/16/97 UPDATE/DISCUSSION: Mary sent a message to inspectors to gather names/information on all future seizures. This is ongoing.		

Alternative 23 - Prohibit ramp employees from taking personal stuff on board aircraft (backpacks, cell phones, pagers, etc).

Discussion: AA employees carry various bags, backpacks etc to flights they are working. These items may be used to remove narcotics and transport from aircraft, or used to coordinate the removal, or to report when the narcotics have been discovered. AA has been working through its personnel channels, negotiating with the Union etc to try to eliminate these items from the field/aircraft.

Action Plan:

WHAT/HOW	WHO	WHEN
American Airlines continue to pursue through personnel/union/legal means 9/18/97 UPDATE: Little progress - not hopeful - will continue to pursue with AA employees union. They have been successful with contractors, rules have been issued, personal items prohibited with reason.	AA Divan	Ongoing report progress Ongoing
Customs search employee bags, etc after they leave aircraft area, once nexus with border is established/observed.	USCS CET Rovers	7/29/97 Ongoing

12/16/97 UPDATE/DISCUSSION: A.A. has done all they can with this issue at this level. There is no further action this group can take, other than to elevate the issue to a higher level of authority.

Explore/obtain feedback from higher level of A.A. Management. AA/David Divan By 1/10/98

1/29/98 UPDATE: Issue has been raised at the highest level. David Divan feels better about getting it and he is 75% certain that it will happen. Mike Ginn said that they see ramp people using cell phones and pagers. AA is having more discussions on this issue because of the problems in San Juan.

5/28/98 UPDATE: David thinks they will get this. It has gone to the highest level. The only issue is the union issue that is holding it up.

8/5/98 UPDATE: David said this issue will probably have to be raised to Mr. Baker. Someone at a higher level will have to make the decision.

2/10/99 UPDATE: David reported that this issue is still being discussed. Last night David and Tom didn't see any backpacks when they were on the field.

3/25/99 UPDATE: David reported that AA Security in Miami issued a letter to Miami employees regarding ramp employees taking personal stuff on board aircraft. David checked with Human Resources. Employee Relations did a survey as to what AA is doing everywhere else. It will have to be a station by station resolution. AA needs to monitor the situation in Miami. Mary Rice asked for a copy of the letter for the SPS Project Book.

5/12/99 UPDATE: Rudy was not at the meeting to report on Customs' request for AA to release the letter addressed to all AA employees in Miami regarding ramp employees taking personal stuff on board the aircraft. Tom reported that Customs at the airport (George Dickinson) won't support AA's policy on backpacks. Tom is looking for support in the form of a letter from Customs and Dade County. Dade County told AA's union that they had no policy on this issue. Mary recommended putting an addendum to AA's Super Carrier Agreement. Maureen said if AA amended their agreement, the policy should be applied at every airport. Ric suggested that if Wayne Zimmerman did not release the letter to Customs, AA could possibly send a letter to Customs explaining AA's policy and ask for Customs' support.

WHAT/HOW	WHO	WHEN
Check with Wayne Zimmerman regarding release of his letter to Customs. (Letter was issued by AA, Security, Miami, to employees in Miami regarding ramp employees taking personal stuff on board the aircraft.) Fax copy of letter to Mary Meier and Mary Rice.	Tom/Ric	5/28/99
Research as to why Customs (George Dickinson) won't support AA's policy on AA employees taking personal stuff on board the aircraft. Prepare letter to AA.	Mary	6/11/99

7/22/99 UPDATE: Ric provided copies of two American Airlines letters. In the first letter, dated June 26, 1995, American Airlines notified All Ramp Service Personnel that Customs in Miami had cited AA for allowing employees to carry a personal bag while working on the airfield. It stated that this practice is a direct violation of Customs procedures and will subject individuals, carrying such an article, to search/seizure measures that may result in detention, ID badge confiscation and/or arrest. The letter stated that effective immediately no employee may carry a bag of any type for their personal effects while on the airfield. Failure to comply with the directive may result in disciplinary action up to and including dismissal. The second letter, dated March 15, 1999, is addressed to Ramp Access Employees. The subject is ramp access and personal bags on the ramp. The letter states that recent incidents indicate that it is appropriate to again share local security regulations. AA said that any employees found on the ramp without a valid business reason is in violation of FAA and Company security regulations. In addition, as was outlined in previous memos, no employee is allowed to be on the ramp with a personal bag, including backpacks. To do so violates Customs, DCAD and Company regulations. Employees were told that a personal bag is subject to search and to use a locker to store personal belongings.

The issue of George Dickinson not supporting AA's policy regarding backpacks was discussed. Mary Meier said the issue with George Dickinson is dead. John Reddin requested that the Group revisit this issue at the next meeting.

Alternative 25 - When narcotics are discovered in a foreign location, replace with sham and allow it to come to Miami to identify the receivers in Miami.

Discussion: American Airlines advised that they were not permitted to do this on their own, that they had to obey the laws and rules of the foreign country, that DEA would have to be involved and could not possibly respond in time to permit the narcotics to be manipulated and replaced with sham. They are concerned about the health and welfare of their employees. Two of their employees have been jailed because they found narcotics and reported them and the foreign government arrested them as if they were involved. They advised that the foreign police may even be involved in the smuggling operation, etc. Customs agreed that the possibility of tampering with the drugs and replacing them with sham was risky, that the DEA could not respond without causing a delay that would be suspicious and would be communicated by the conspirators lessening the possibility of identifying the receiver in Miami. Customs commented that if they had information about the find timely, we could go on and put a package of sham in the area where the drugs should be and then try to identify the person retrieving, try to identify those employees who may access the particular area, etc. The communication from down south via the SABRE system is available to all AA employees. Future communications concerning narcotics finds need to come via phone to Tom Dowd's office. Present practice of using SABRE permits internal conspirators to know when their loads have been discovered...no chance of delivery/detection on this end.

Action Plan:

WHAT/HOW	WHO	WHEN
AA to notify Customs at time of discovery in foreign	Tom Dowd to CET to OI	7/29/97
OI to plan process for getting packages etc on aircraft when reports come in	USCS/OI Lowen	9/1/97
AA change method of reporting incidents	Tom Dowd	By 9/1/97
Revisit this issue and update at next meeting	All	9/11/97

9/18/97 UPDATE: Difficult for AA to do in foreign - Same status.

12/16/97 UPDATE/DISCUSSION: REVISIT at next meeting.

1/29/98 UPDATE: Mary Meier briefed the Team on a SPS Project being done with Avianca in New York. If drugs are detected down south, they leave them on the plane and notify Customs. In U.S., Customs searches plane, takes drugs and substitutes sham. It is being done on overnight flights only. Customs would need AA's permission. AA expressed concern as to putting their employees in jeopardy. AA likes the idea. They need time to think about it and discuss it with their legal people.

5/28/98 UPDATE - Gonzo said Customs is substituting a sham with Avianca. AA wants to know when that would happen. Scott would like AA to seize the drugs in the foreign country and notify Customs. Since Customs is first on the plane, they would put a sham on the plane here in the area where the drugs should be. The Agents would wait and see if anyone pulls it.

8/5/98 UPDATE: David said AA people seem to focus on risk factor for employees. David isn't willing to take the responsibility for this. He won't recommend it. COMPLETED.

Alternative 29 - Search any vehicle leaving the area after contact with arriving international aircraft.

Discussion: Certainly within Customs authority. Vehicle stops, gate stops etc, only useful for short period of time as word will get out. Periodic, random, vehicle under constant surveillance from aircraft to point of search. Concentrate on vehicles leaving field for employee parking lot.

Action Plan:

WHAT/HOW	WHO	WHEN
Establish/coordinate operations to conduct vehicle stops and searches	USCS/Martins	By 9/1/97
9/18/97 UPDATE: Vehicle stops not necessary under constant surveillance.	Martins	After 10/1/97
12/16/97 UPDATE: Implemented.		Ongoing
1/29/98 UPDATE: Will probably increase due to new narcotics initiative.		Ongoing
5/28/98 UPDATE - Ric reported that their 1-800 calls have increased this quarter.		

Alternative 35 - American Airlines offer awards and incentives to employees for information concerning smuggling.

Discussion: American Airlines has system in place for US based employees. Technical problems with compensation issues in other countries prevents some forms of rewards etc.

Action Plan:

WHAT/HOW	WHO	WHEN
Procedure/program in place no action required.	AA	7/29/97
		COMPLETED

Alternative 37 - Conduct K-9 sweeps of employee locker rooms, mechanics areas etc.

Discussion: American Airlines has been conducting periodic sweeps using private K-9's and Metro Dade.

Action Plan:

WHAT/HOW	WHO	WHEN
Conduct K-9 Sweeps of employee locker rooms and work areas	AA	7/29/97
9/18/97 UPDATE: This is being done, on the schedule.	AA	Ongoing
1/29/98 UPDATE: Advise Tom Dowd to continue to do sweeps.	AA/Rudy Ramirez	Ongoing

12/16/97 UPDATE/DISCUSSION: No sweeps have been conducted since September. This is Ongoing.

1/29/98 UPDATE: AA hasn't done them for several months. Dog hit on locker but there wasn't any drugs. David Divan said AA should continue to do them.

5/28/98 UPDATE - AA approached DEA. They have backed off doing sweeps with dogs. Scott said they ran in to problems with supervisors regarding breaking the locks. AA said when OI is ready to let them know. OI is holding off for now.

CLOSING OBSERVATIONS

12/16/97

We have come to some closure on a major issue.

We have a lot of work to do.

Try to keep momentum going - set next meeting.

See some real progress.

Terrible chairs!!!

Refreshments.

1/29/98

Great improvement.

Great comments made by Mike Koncir and Earl Switzer!

3/25/99

Very pleased and encouraged by the way the visit to Tulsa and Alliance went and by the meeting in Dallas.

There has been a lot accomplished since we last met on February 10, 1999 - trip to Tulsa and Alliance and video.

American Airlines is committed to this SPS and to this relationship with Customs.

PARKING LOT

(Other issues and alternatives, temporarily set aside, to be considered, discussed, etc.. at a later date.)

9/18/97:

Caterers and other contract services.

Address search of aircraft mechanic Issue - Include FAA - hold a separate meeting to include the following:

- Legal - Customs

- Maintenance - AA - Ric

- FAA - Flight Safety - Bill Crow, Principal Maintenance Inspector
(972-456-6732)

- AA - Managing Director of Safety, Thomas McFall

- AA - Chief Pilot

How many violations is American Airlines incurring, as a result of Customs examinations?

7/29/97 - Analyze Situation/Develop Alternatives:

Team members have been working and communicating for years concerning this problem. The situation is well known to all parties. Despite all efforts to date, narcotics continue to be smuggled aboard AA aircraft. The following alternatives were developed through brainstorming:

1. ***Ensure ramp access to AA aircraft is controlled to authorized persons only.***
2. Hand search persons going on aircraft to conduct work (down line stations).
5/28/98 - Is being done by AA now. It has been done for 10 years. Completed.
3. Seal aircraft with guard on board in South America.
5/28/98 - This is being done by AA any place where the plane is overnight or on the ground for 6 hours or more. A guard seals the plane and remains outside the aircraft. Completed.
4. Seal overnight aircraft in Miami.
5/28/98 - AA says it isn't being done and won't ever be done. It isn't feasible. Completed.
5. Have security stay longer with aircraft while it is on the ground in Miami and at down line stations.
5/28/98 - 5a. - No. AA says it's not feasible in Miami. 5b. - Yes. Down line stations have security. Completed.
6. Ensure that no employee stays at or reports to a flight when they are off the clock.
7. Ensure employee on day off are denied access to aircraft.
14. Prevent employees from swapping assignments.
5/28/98 - Combine #6, #7 and #14.
#6 and #7 - It is a regulation with AA already. There is disciplinary action. Completed.
#14 - AA said it wasn't workable. It's in the contract. AA says it isn't suppose to happen but it happens. Completed.
8. ***Record names of all persons coming in contact with aircraft in Miami and Foreign.***
9. Record names of persons coming in contact with aircraft where violations have occurred.
5/28/98 - Is being done now by AA. Completed.
10. ***Allow full access to every part of aircraft to Customs.***
11. Run K-9 on everyone who has access to an aircraft as they leave it.
5/28/98 - Too many passive dogs would be needed for each flight. On a daily basis it would be impossible. There are no passive dogs on CET. Gonzo said they could do some randoms.
12. ***More efficient use of closed circuit TV and surveillance cameras.***
13. Send Customs or AA security to foreign locations to search aircraft en route to Miami.
5/28/98 - AA has no problem with this.
15. ***Conduct special operations on overnighing aircraft parked on ramp in Miami.***

16. ***Ensure that no one is fired from AA for involvement with smuggling without coordinating with USCS Office of Investigations.***
17. Coordinate firing of employees with OI (include all narcotics violations in addition to smuggling).
32. Provide Customs with the names of people fired to track to next employer (airline).
5/28/98 - Combine #16, #17 and #32. - AA says it is being done. Completed.
2/10/99 UPDATE: John Reddin reported that he is being notified by AA.
18. ***Increase Customs presence at more aircraft (arriving flights).***
19. Use off-duty police to guard aircraft perceived to be high risk.
5/28/98 - Tom has 20 retired cops that are employees of AA. Their primary job is anti-theft and drugs. Ric has 70 contract drug security employees for drugs and terrorism. They check the aircraft for drugs, searches belly and looks at anything unusual. Gonzo said Customs could do a spot check on certain flights. Customs could challenge an employee to check his ID against the list of employees. Gonzo would notify Ric of spot check.
20. Ensure ramp employees are unaware of assignments prior to day they are working.
5/28/98 - David Divan said that at present it isn't 100% possible. Gates are assigned by the tower. There is a bidding system and most times they don't know specific flights but they have an idea.
21. Assign OI Special Agent to fly with AA around the world.
5/28/98 - Scott said it wasn't feasible. Completed.
22. ***Initiate financial investigations on employees whoa are repeatedly near or around violative aircraft (suspected of involvement with narcotics smuggling).***
23. ***Prohibit ramp employees from taking personal "stuff" on board aircraft, (backpacks, cell phones, pagers, etc.).***
24. Provide arrest reports of foreign actions by American Airlines (employees, etc).
5/28/98 - AA does this already. All arrests are sent to Mike Koncir. Scott asked AA to send him a copy also. It was decided that Scott would come by AA and pick it up. Completed.
2/10/99 UPDATE: John Reddin said that he was receiving information from AA.
25. ***When narcotics are discovered (on board aircraft) in foreign locations, coordinate with OI and replace with sham to identify receiver in Miami.***
26. Look at foreign site surveys to see if changes in procedures have occurred (follow-up).
27. Do site surveys of Peru, Ecuador and Panama.
5/28/98 - Combine #26 and #27. Customs has done a few but not on a regular basis. Revisit.
2/10/99 UPDATE: Mary Meier recommended that Ecuador be looked at. David said that AA would be glad to have Customs do it. Mike Koncir said that he may be able to fit one in on a future site survey but not the first site survey. Mike Koncir said he will pull up the site surveys to see what has been done. Mary Meier will contact Al Gina regarding the Inspectors doing site surveys.
3/25/99 UPDATE: Mary hasn't contacted Al Gina yet.
5/12/99 UPDATE: David reported that Leon Hayward, Customs, Headquarters, called him to

see if AA wanted a site survey in Curacus. Mike said he did a surprise inspection of AA the last time he was in Ecuador. Mary doesn't want to send anyone to Ecuador now because of the unsafe conditions there. Mike reported that James Elder, SAC, Miami, goes to Jamaica every month. Air Jamaica and American Airlines in Jamaica asked James Elder if anyone from Customs could come to Jamaica to provide training in cargo. Mary said she forwarded the request to Headquarters. David and Maureen expressed concern over what Customs would say to the AA employees in Jamaica. Mike said they have general training material that they use. Mary said if AA wants a site survey in Jamaica, she would need to request funding from Headquarters.

Action Plan:

WHAT/HOW	WHO	WHEN
Request funding from Headquarters to conduct training and do site survey in Jamaica.	Mike/Mary	5/21/99
Contact Mike Koncir regarding site survey in Jamaica.	Mike/Mary	5/21/99
Contact Air Jamaica regarding site survey in Jamaica.	Mike/Mary	Upon approval from HQ
Contact Chaim Koppel regarding site survey in Jamaica.	Dave	5/21/99

7/22/99 UPDATE: Mike Koncir reported that site surveys will be done in Montego Bay and Kingston in October. In addition, training will be conducted by Mike Koncir in October in Montego Bay. The issue of a site survey being done in Haiti was discussed.

Action Plan:

WHAT/HOW	WHO	WHEN
Contact John Holbrooke, International Affairs, Headquarters, regarding a site survey in Haiti.	Mike Koncir	8/23/99

28. Search AA vehicles leaving the field toward the employee's parking lot.
5/28/98 - Customs does spot checks.
2/10/99 UPDATE: Customs is doing more pat downs on the field. AA has taken on some of their own efforts and initiatives. Tom said that he works with George Dickinson and the Rovers also. AA encourages Customs to do the spot checks. AA is going to their Human Resources as to what is being explained to new employees at orientation.
29. *Search any vehicle leaving the aircraft (after contact with the aircraft).*
30. Change AA ITI (international to International) programs - no more tail to tail transfers, require transfer through intermediate area.

5/28/98 - AA said it would kill them. AA said there are a lot of drug seizures on ITI bags. Not feasible. Revisit.

2/10/99 UPDATE: Has been resolved by both AA and Customs satisfactorily. Completed.

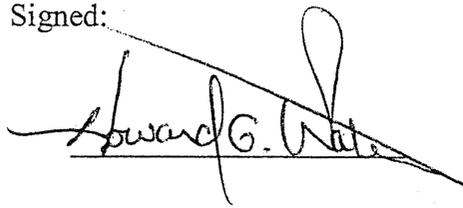
31. Have crew notify Customs/AA Security of changes observed in air craft, (modifications etc).
5/28/98 - AA said pilots are very observant. Captain detected cocaine in coffee. Completed.
33. Place informants with AA with assistance of AA security.
34. Use of undercover.
5/28/98 - Combine #33 and #34. - AA does this on an ongoing basis. Immigration and Customs employees work on the reservations desk. Customs said it isn't applicable because it is too cliquish.
35. *AA offer awards and incentives to their employees for information about smuggling.*
36. Conduct K-9 sweeps of areas where mechanics are dispatched from and where tools/parts are stored.
37. *Conduct K-9 sweeps of employee locker rooms (Mechanics etc.).*
— 5/28/98 - Combine #36 and #37.
38. Prevent employees from carrying knives, luggage keys, weapons on aircraft.
5/28/98 - Knives and weapons aren't allowed by Dade County. It is difficult to control luggage keys. Customs could include in their training.
39. *Install cameras on the aircraft.*
40. Review/update Super Carrier Agreement.
5/28/98 - AA and Customs reviews and updates with Mike Koncir once a year. David Divan meets regularly with Mike Koncir.

NOTE: Items in bold/italics have been accepted and are implemented/ongoing.



MEMORANDUM OF ACTIVITY



Case Number: 2002-0019	Reporting Office: Miami Field Office	Type of Activity: Interview
Date of Activity: 12/11/2001	Time of Activity: 3:00 p.m.	Location of Activity: United States Customs Service, Miami International Airport
Subject of Activity: Thomas S. Winkowski Area Port Director, Miami International Airport, Miami, Florida	Activity Conducted By (Name(s) and Title(s)) Howard G. Waters, Special Agent	Signature(s) and Dates(s) Signed: 

On December 11, 2001, the Treasury Office of Inspector General (OIG) interviewed Thomas S. Winkowski, Area Port Director, Miami International Airport (MIA), United States Customs Service (USCS), Miami, Florida. Winkowski was interviewed regarding allegations that Jayson P. Ahern, Director, Field Operations for Southern California, Customs Management Center (CMC), United States Customs Service (USCS), San Diego, California, while serving as Port Director at MIA, provided American Airlines with three hour advanced notice prior to conducting outbound inspections.

Winkowski provided in substance the following information:

Winkowski stated that he became the Area Port Director in March 1999. Winkowski stated that Assistant Commissioner Sam Banks notified him in January 1999 that he was to be transferred from Area Port Director Los Angeles, California to Area Port Director, Miami, Florida via a directed reassignment. Winkowski admitted that prior to his arrival that advance notification was given to American Airlines prior to any Outbound Inspections.

Winkowski stated that the week prior to his arrival in Miami, Raymond Kelly, Commissioner, USCS, visited the Port of Miami and spoke with Customs Inspectors in a "Town Hall Meeting". Winkowski stated that during the "Town Hall Meeting" several Inspectors complained to Kelly that the advance notification policy given to American Airlines and other carriers was

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MEMORANDUM OF ACTIVITY

Case Number: XXXX-XXXX	Subject of Activity (Brief Description): XXXX	Date of Activity: xx/xx/xx
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jeopardizing their enforcement posture and thus reduced the number of seizures. Winkowski related that Commissioner Kelly informed the Inspectors that he did not like the advance notification policy and would look into it. Winkowski said that once he arrived in Miami, Assistant Commissioner Sam Banks informed him about Commissioner Kelly's posture on the advance notification policy. Winkowski related that the decision was "pretty much already made for me."

Winkowski related that he decided to issue a letter to abolish the advance notification procedure. Winkowski said that he could not find a written letter or procedure for providing the advance notification to American Airlines. Winkowski said that he drafted a policy letter and scheduled a meeting with American Airlines. Winkowski stated that he met with Ric Arner, Manager, International Operations, American Airlines, within a week of arriving in Miami and he gave the letter to Arner rescinding the advance notice policy.

Winkowski said that he did talk to Ahern about the advance notice policy. Ahern admitted to Winkowski that he (Ahern) did order the advance notice policy. Winkowski related that Ahern told him that the decision to implement the policy stemmed from the push from D. Lynn Gordon, former Director, CMC, Miami, Florida, and her emphasis on "Reinvention of Government" and complaints about flight delays from American Airlines. Winkowski stated that Ahern told him that Gordon was very aggressive and placed a lot of emphasis on working with the airlines and the trade industry. Winkowski added that there is a fine balance between enforcement and regulation. Winkowski provided the OIG with copies of the minutes of the Commissioner Kelly, "Town Hall Meeting", and the letter he gave to American Airlines rescinding the advance notification policy.

Attachments:

Reviewed By (Initials): DB Date: 1/28/02

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Date Printed: 1/22/02
OI Form-09 (10/01)

Office of Inspector General – Investigations
Department of the Treasury

Author: Thomas Winkowski at Area-Los_Angeles-1
Date: 3/24/99 5:19 AM
Priority: Normal
TO: GEORGIA ANN MADDOX at PORT-MIAMI_CCC-1_PO
Subject: AA document

----- Message Contents -----

Pls print for me.

TSW

Forward Header

Subject: AA document
Author: PETER J BAISH at HQ-4_PO
Date: 3/16/99 12:01 PM

Need your assistance in getting answers to the Outbound questions.

Peter

Forward Header

Subject: AA document
Author: ALLEN GINA at HQ-4_PO
Date: 3/15/99 5:23 PM

Please see attached.

There were some pen and ink changes made to the first document.

Please discard first draft.

Thanks

Al

American Airlines issues raised during town hall meeting in Miami.

ISSUE:

Recently the Commissioner held a Town Hall meeting for Customs personnel in Miami, Florida. Among the issues raised by the Customs employees present, there were four with regard to American Airlines. They are as follows:

- U.S. Customs in Miami gives American Airlines preferential treatment. }
- Customs personnel must have an American Airline Mechanic accompany them when performing an aircraft search. }
- U.S. Customs gives American Airlines a one hour notice prior to performing an outbound examination of a departing flight.
- Customs personnel must remove the X-Ray van five minutes prior to departure time of an American Airlines flight.

FINDINGS:

The Miami office was contacted regarding the above issues and were asked to comment accordingly. The following reflect the answers compiled by the Acting Airport Director, Airport CET Chief, and Outbound Enforcement Chief.

- **U.S. Customs in Miami gives American Airlines preferential treatment**

Initial data does not indicate that American Airlines receives any preferential consideration.

There are two charts that were compiled depicting the number of American Airlines planes that were searched in comparison to other airlines.

One chart depicts the flights searched by CET and what percentage of CET searches an Airline receives. American Airlines counts for 13.53% of CET searches. (SEE ATTACHED)

The other chart looks at (for the month of Jan only), total international arrivals by airline and shows the percentage of CET searches. 6.48% of American flights were examined. (SEE ATTACHED)

To get an exact picture of American in comparison to other Airlines, one would have to factor in the country of origination for each flight, the risk factor of each country, how the risk was

factored in when selecting flights to search, and any other variable that goes into selecting airlines for examination. At this time the port was not asked to perform this analysis.

- **Customs personnel must have an American Airline Mechanic accompany them when performing an aircraft search.**

Since 1/98 this has not been the policy in Miami.

Chronology -AA Aircraft Search/Mechanics Issue

May 9, 1997

- ▲ While searching an AA aircraft, a CET inspector opened a speaker panel in the ceiling of the lavatory. This accesses an area where drugs have been found in the past. When she took out the first of four screws, the panel fell to the floor, which tore the speaker wires. She immediately located AA personnel at the jet bridge and advised them of the damage. The repair of this panel caused a 22 minute delay in the departure of that aircraft.
- ▲ That same date, on another AA aircraft, there was a material failure on a a/c door latch which they assumed Customs had done, but Customs inspectors indicate they had not, to their knowledge, damaged any door latch.
- ▲ On a third aircraft, the same date, there was damage to the right emergency exit oxygen panel. It appeared to have been torn out and thrown on the ground; all wires behind the panel were pulled. Customs shift reports indicated that CET did not work that flight. Customs was told by AA that a CEO and dog went onboard alone. Despite our questioning, we were never able to determine whether this was true. Other factors which made this allegation questionable were that Customs CEO's do not search planes individually, and all Miami CET officers are trained to immediately report any damage resulting from their activities. Reporting damage is routine for CET inspectors.

Customs did learn that a number of the "security mechanics", whose job it was to support CET when needed, had been given notice that they were to be laid off. As a result of the above incidents, all those who were to be laid off were retained by AA's to open all panels CET wished to open.

(It was the policy of AA that all damage to an aircraft be reported directly to Mr. Crandell, the CEO. Subsequently there was a meeting of AA management with its Chief Pilot, and Art Torneau, VP in Charge of Miami operations. Mr. Torneau decided he did not want any aircraft touched by Customs. He believed that

because we did not possess FAA mechanics' certificates, we were violating FAA regs every time we opened a panel. He decided to make mechanics available to open panels when requested by USC, and conveyed his concerns to the CMC.)

A decision was made locally to use the mechanics to open panels and discontinue the opening of panels by CET personnel. Shortly after this new policy was initiated, the aircraft search/mechanic issue was brought to the SPS. Counsel was enlisted to explore the legality issues, and a subgroup of inspectors and AA mechanics was formed to work out issues of narcotics concealment areas on the various aircraft and report to the larger SPS group. A legal opinion of the search authority was sought from and drafted by Associate Chief counsel. It was received in November, 1997, and the new search procedures, in which CET opens panels, then advises AA mechanics as to what panels are open so they may secure them was implemented in January, 1998.

Port management closely monitored this procedure for some time. There have been no issues, conflicts or questions in this area for many months.

- **U.S. Customs gives American Airlines a one hour notice prior to performing an outbound examination of a departing flight.**

Local Policy. Not in writing. Oral instructions to employees.

About 1991, in a Carrier Initiative workout session with AA, a suggestion was made for Customs to give AA an hour notice when Customs wanted to examine a flight. This would allow AA to make arrangements to get more resources to that flight, thus expediting/mitigating the impact. AA has come to feel this is their right and that we are in violation of policy if they don't get the notice. Customs Supervisors report that instead of sending resources to expedite the flight, AA now sends one person with a clipboard who stands there, takes notes and continually harangues the Customs personnel with comments about calling HQ's and the CMC.

The Port is being instructed to reevaluate this position and create a policy that is consistent with all airlines.

- **Customs personnel must remove the X-Ray van five minutes prior to departure time of an American Airlines flight.**

Local Policy. Not in writing. Oral instructions to employees.

Awaiting further details from the port.

The port is being instructed to reevaluate this position and create a policy that is consistent with all airlines.



DEPARTMENT OF THE TREASURY

U.S. CUSTOMS SERVICE

MIAMI, FLORIDA

MAR 29 1999

ENF- 8:PD:A:O NMN

Mr. Ric Arner
Manager International Operations
American Airlines
P.O. Box 997990
Miami, Florida 33299-7990

Dear Mr. Arner:

The purpose of this letter is to inform you that I have requested that the Miami Outbound Enforcement Team modify several key sections of its operating procedures. I apologize for the short notice, but I believe the below mentioned changes are critical to our enforcement efforts and must be implemented immediately.

In order for the Miami Outbound Enforcement Team to be compliant with national Customs' policies and procedures, we will no longer provide an advance notice to airlines prior to examining targeted flights. At present, the courtesy notice only applies to American Airlines and ACES Airlines. ACES Airlines will also be notified of these changes. While it is understood why this advance notice agreement was implemented, it is found to be inconsistent with Customs' national policy and increases the possibility for compromise of Customs enforcement efforts.

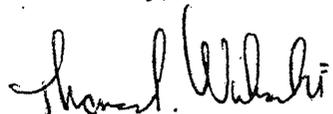
The agreement to have Customs Outbound x-ray vans removed five minutes prior to departure time has been reviewed and determined that it lends itself to internal conspiracies. Miami Outbound Enforcement Teams' SOP has been modified to ensure that Outbound Supervisors are intricately involved in deciding when equipment and personnel are to be pulled off a flight. When making this decision, flight delays will be considered, as well as the enforcement concerns.

I recognize the importance that American Airlines, as well as the entire air industry places on ensuring that aircraft departures are accomplished in a timely matter. Please be assured that we will do everything possible to minimize the impact on American Airlines. I have instructed Branch Chief Norwood to coordinate a meeting for the near future, where this

subject and possible additional changes in our operating procedures may be discussed. Should you have any questions or need additional information, please do not hesitate to contact me at 305 869-2800.

Thank you for your understanding and cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas S. Winkowski". The signature is written in a cursive style with a prominent initial "T".

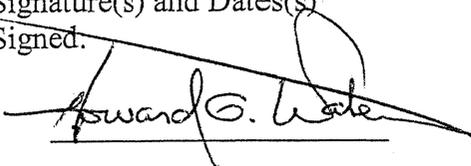
Thomas S. Winkowski
Port Director
Miami Service Port

cc: Director, Office of Field Operations, South Florida



MEMORANDUM OF ACTIVITY



Case Number: 2002-0019	Reporting Office: Miami Field Office	Type of Activity: Interview
Date of Activity: 12/13/2002	Time of Activity: 3:00 p.m.	Location of Activity: United States Customs Service, Customs Management Center, San Diego, CA
Subject of Activity: Jayson P. Ahern Director of Field Operations, Customs Management Center, San Diego, CA	Activity Conducted By (Name(s) and Title(s)) Howard G. Waters, Special Agent James Kozlowski, Special Agent	Signature(s) and Dates(s) Signed.  _____

On December 13, 2001, the Treasury Office of Inspector General (OIG) interviewed Jayson P. Ahern, Director, Field Operations for Southern California, Customs Management Center (CMC), United States Customs Service (USCS), San Diego, California. Ahern was interviewed regarding allegations that while he served as Port Director of Miami International Airport (MIA), he provided American Airlines with three hour advanced notice prior to conducting outbound inspections.

Ahern provided in substance the following information:

Ahern stated that he has worked for the USCS for the past twenty-five years. Ahern said that currently he is the Director for Field Operations for Southern California. He has served in this position since February 12, 2001. Prior to his current position, Ahern served as the Port Director of Los Angeles International for two years. Ahern said that from October 1995 until his directed reassignment in February 1999 he served as the Port Director of Miami International Airport.

Ahern stated that during his tenure at MIA, at no time did he or any of his staff provide American Airlines with preferential treatment. Ahern admitted that he did institute a local policy at MIA, and instructed the USCS Outbound Inspectors to provide American Airlines with a one-

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MEMORANDUM OF ACTIVITY

Case Number: 2002-0019	Subject of Activity (<i>Brief Description</i>): Jayson P. Ahern	Date of Activity: 12/13/01
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hour advance notification of flights to be inspected. Ahern admitted that this was an operational decision made by himself and was not directed by D. Lynn Gordon, former South Florida CMC Director.

Ahern said the decision to provide American Airlines with a one-hour advance notification was based upon the fact that they (American Airlines) were signatory to a national program administered by USCS Headquarters called the Super Carrier Initiative Program (SCIP). In this program, USCS and American Airlines worked in partnership on a variety of drug prevention and security initiatives. This partnership led to American Airlines providing the USCS with intelligence and information on internal and external drug smuggling conspiracies within the airline. American Airlines also provided the Outbound Inspection Team with a terminal and access to their reservation system. Ahern said that the only thing that American Airlines asked in return was to provide them a one-hour advance notice on outbound inspections on certain flights, specifically to Colombia and other high source countries.

Ahern said that he agreed to this provision because despite what the workforce thought, he (Ahern) said that in no way did this negatively impact our (USCS's) ability to do our job. It also did not alert potential internal conspirators to our tactics. Additionally, Ahern said that he did not guarantee American Airlines that USCS would do this in all instances and some inspections were conducted at the last minute without prior notification. Ahern stated that when notification was provided it was given to American's Security office or to a management official. Lastly, Ahern related that he had no information or intelligence that demonstrated that his decision compromised the efficiency or integrity of the enforcement mission.

Ahern admitted that he knew the decision would be unpopular with the Inspectors on the Outbound team. Ahern stated that his decision was made with Outbound Chief, Chief Inspector Michael Norwood present and another member of the Outbound team. Ahern said that this demonstrates that his decision was made in the open and that he was not hiding anything. Ahern stated that he made his decision on merit and it was not for any personal gain. Ahern provided the OIG with a sworn affidavit.

Reviewed By (*Initials*): DB Date: 1/28/02

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I, Jayson P. Ahern am currently assigned as the Director, Field Operations for the Southern California Customs Management Center located in San Diego, California. I am a career member of the Senior Executive Service. I have been assigned in San Diego since February 12, 2001 and for the two years previous, I was the Port Director in Los Angeles, California. During the period of time from October of 1995, until my reassignment to Los Angeles in February of 1999, I was assigned as the Service Port Director in Miami, Florida.

On December 13, 2001 I was interviewed in my office by Special Agents Howard Waters and James Kozlowski of the Office of the Inspector General relative to an allegation that occurred during my tenure as Service Port Director in Miami. The issue was presented to me that there was an allegation that in my official capacity, I provided American Airlines preferential treatment by providing them a one-hour notice in advance of any outbound enforcement activity on their departing flights. The following is a summary of my points that were discussed with Special Agents Waters and Kozlowski that will be submitted for the official record

At no time was American Airlines given preferential treatment whatsoever in this or any other action by me or by any members of my subordinate management staff.

This action was not directed by then CMC Director D. Lynn Gordon. This was an operational decision that was made by myself.

American Airlines is a signatory to a national program administered by Customs Headquarters called the Super Carrier Initiative Program (SCIP). In this program Customs and American worked in partnership on a variety of drug prevention and security initiatives so that their carrier could diminish its drug violations. As part of this program, American agreed to provide specific drug intelligence on narcotics that were found in foreign locations onboard their aircraft by their personnel. Also, in numerous instances these narcotics were allowed to fly to the US for seizure or in furtherance of internal conspiracy investigations. During this time, American provided significant information that resulted in dozens of cocaine and heroin seizures. These numbers are maintained and tracked by Field Operations in Washington, DC by the Anti-Smuggling Division. I was directly aware of this high level of collaboration and cooperation provided by American's Corporate Security Division.

American Airlines was also very cooperative and instrumental in a Strategic Problem Solving Initiative that led to the arrest of significant numbers of their ramp personnel as part of an internal drug smuggling conspiracy. They cooperated with Customs and other law enforcement agencies in this international drug smuggling investigation. I was aware of this high level of cooperation by American Airlines.

Jayson P. Ahern
12/14/01

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In addition to American's interest to support Customs in its law enforcement mission, American was also interested in running an efficient airline that is predicated on timely arrivals/departures of their aircraft. Towards that end, Customs and American would routinely sit down to discuss items of mutual concern in an attempt to problem solve these operational issues.

One particular point of American's was our outbound currency operation and the delays they would take on account of our lengthy inspections. We discussed better ways to handle our process and sought assistance from American. We asked for additional personnel from management or security from American to be on hand to assist with baggage retrieval and other areas we needed them for. We also asked and received access to American's reservation database (SABRE) so that we could more effectively target passenger's on their flights versus manual inspection of everyone in the jetway. American installed this at their expense in our outbound office. The most significant thing American asked in return was for us to provide a one-hour advance notification on when we were going to conduct our inspections on certain flights.

I agreed to this provision for the following reasons:

First, in spite of the perception in our workforce this in no way negatively impacted our ability to do our job effectively nor, did it alert potential internal conspirators to our tactics. We were targeting ticketed passengers illegally exporting currency from the United States, not airline conspiracies.

Second, we never guaranteed that we would do this in all instances and in fact, we did conduct many last minute examinations absent notifications.

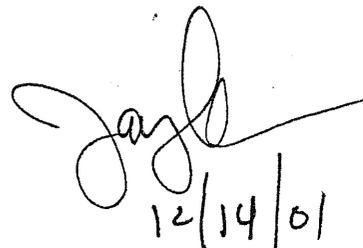
Third, this notification was provided to American's Security office or to a responsible management official.

Fourth, the notification was provided for planning purposes so that American could assign additional personnel if necessary to have an on time departure or retrieve a targeted piece of checked luggage if requested by us.

Fifth, I considered American's installation of their SABRE terminal in our office a significant contribution to our enforcement efforts that gave us the capability to target potential high risk travelers on their flights versus manually inspecting all their passengers in the jetway during the boarding process.

Sixth, I did not have any information or intelligence brought to my attention that demonstrated that this compromised the efficiency or integrity our enforcement mission.

Lastly, I considered American's efforts in the SCIP and the significant contributions they made to our narcotics enforcement results.

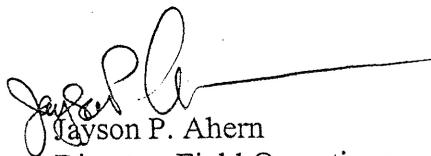

12/14/01

I was aware at the time when this decision was made that it would not be popular with some outspoken members of our outbound team. Their issue was that we were acquiescing to the concerns of American over the concerns of Customs. This was not the case. Further, knowing that it was controversial issue with some of the staff, I addressed it openly and expressed my rationale to the Team during one of their briefings.

I clearly am empathetic to the concerns of our workforce as American's staff was routinely aggressive, demanding and frequently unprofessional in their conduct with our officers. Also, as the largest carrier at Miami International Airport and the most significant employer in Dade County, I can understand our staff's perception of favored treatment.

In the final meeting on this subject with American the Outbound Chief Mike Norwood was present as well an additional member of his team. In my view, this demonstrates that this decision was done in the sunshine and not for any personal gain. Members of the outbound staff were present to hear the discussion of all the issues that were deliberated prior to my decision.

In summation, this decision was not in conflict with any national policy or directive. Also, it is a determination that I would not have hesitated to revoke should I have seen evidence to do so. Further, I assert that the decision to allow American a one-hour notice was a good one, albeit controversial, based the aforementioned facts. Even with the current allegation of preferential treatment, I believe given all the assistance provided by American Airlines to the mission to the Customs Service, we were clearly benefited from this government/industry partnership.


Jayson P. Ahern
Director, Field Operations
Southern California CMC
610 West Ash St.
Suite 1200
San Diego, California 92101

 12/14/01

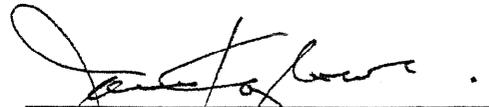
Office of the Inspector General
Office of Investigations
U. S. Department of the Treasury

I have read this statement of 5 pages. It is true, accurate, and complete to the best of my knowledge and belief. I have initialed each page, where necessary, and have been given an opportunity to make any corrections or additions. I have initialed each line where a correction has been made.



(Signature)

"Subscribed and sworn (or affirmed) to before me this 14th day of December,
2001, at EL SEGUNDO, CA."
(City) (State)



Special Agent
Department of Treasury
Office of the Inspector General
Office of Investigations

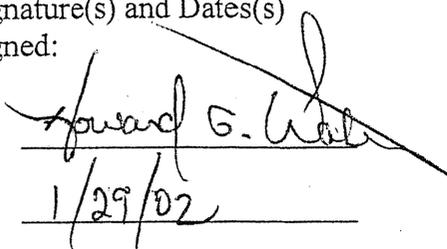
Witness: Richard J. [unclear]

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MEMORANDUM OF ACTIVITY



Case Number: 2002-0019	Reporting Office: Miami Field Office	Type of Activity: Interview
Date of Activity: 1/21/2002	Time of Activity: 3:00 p.m.	Location of Activity: Office of Inspector General, Miramar, Florida
Subject of Activity: Documents obtained from USCS-MIA Outbound Inspection Office.	Activity Conducted By (Name(s) and Title(s)) Howard G. Waters, Special Agent	Signature(s) and Dates(s) Signed:  1/29/02

On January 21, 2002, the OIG reviewed documents obtained from the USCS Outbound Inspection Office. The documents included a Standard Operating Procedure Manual (SOP) and several Customs Directives and Policy notices. Documents also included Customs Handbook CIS HB 3300-03A, Currency and Other Monetary Instruments Interdiction Handbook and the USCS MIA Outbound Team status spreadsheet.

The above listed USCS documents demonstrate that no official USCS directive is in place for notification procedures regarding Outbound Inspections. Additionally, the USCS Miami International Airport, Outbound Inspection Team status spreadsheet revealed that after Ahern instituted the advance notification policy money seizures dropped from approximately 9.7 million dollars in FY 2000, to approximately 4.1 million dollars in FY 2001.

Attachments:

Reviewed By (Initials): DB Date: 1/29/02

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CIS CUSTOMS DIRECTIVES

SUBJECT: OUTBOUND ENFORCEMENT TEAMS

SUBJECT: OUTBOUND ENFORCEMENT TEAMS

CUSTOMS DIRECTIVE

ORIGINATING OFFICE: FO:O DISTRIBUTION: S-01
NUMBER: 3290-016A
DATE: SEPTEMBER 1, 1999
SUPERSEDES: 3290-016, 10/11/95
REVIEW DATE: AUGUST 2001

SUBJECT: OUTBOUND ENFORCEMENT TEAMS

1. PURPOSE.

To provide guidance for establishing multidisciplinary teams to identify, interdict, and investigate export violations.

2. POLICY.

2.1 Those locations where risk has been determined shall establish an Outbound Enforcement Team, consisting of special agents, inspectors, operational analysis specialists, intelligence research specialists, canine enforcement officers, and may include personnel from other Federal, State or local agencies, and government-approved private organizations. Government-approved private organizations are those organizations with whom cooperation and exchange of information are statutorily permissible.

2.2 The size and composition of the Outbound Enforcement Team will be determined by the resources available to support the identified outbound threat. Individual members of the team will be responsible for performing duties consistent with their positions. At locations where resources do not allow for the formation of dedicated outbound teams, risk assessments will be conducted and personnel accordingly assigned to address the threat.

2.3 The Outbound Enforcement Teams shall enforce the export laws of the United States.

3. AUTHORITIES/REFERENCES.

3.1 Authorities: 15 CFR Parts 30 and 730 et seq.; 18 U.S.C. 960-967, 981-982, 1956-1957, 2314-2321; 19 U.S.C. 1481, 1484(f), 1589a, 1627a; 19 CFR Parts 4.6, 192 et seq.; 21 U.S.C. 801, 853, 863, 953, 955, 970; 22 U.S.C. 401-423, 2778; 31 U.S.C. 5312 et seq.; 31 CFR Parts 500 et seq.; 46 U.S.C. App. 91, 1904; 50 U.S.C 401, 1701-1705; 50 U.S.C. App. 3; HB 3000-004, HB 3200-005 Chapter 1; HB 4000-001 Chapters 32, 37, 41.

3.2 References: Customs Service Five Year Plan; Customs Service Annual Plan; Local Annual Outbound Risk Assessments; CD 099 3290-015 "Canine Enforcement

Program" (September 7, 1995); CD 099 3290-013 "National Inspectional Contraband Enforcement Team Policy" (December 8, 1993).

4 RESPONSIBILITIES.

4.1 The Director, Outbound Programs, in conjunction with the Office of Investigations Division Directors of Financial, Fraud, Strategic Investigations, and Smuggling, shall have policy oversight for the Outbound Enforcement Program, which will include the formulation and implementation of guidelines and procedures in accordance with the Five Year Plan.

4.2 Port Directors and Special Agents in Charge are responsible for the overall policy implementation of this program.

4.3 The Assistant Port Director, Outbound Operations, or functional equivalent at the port level, and the Assistant Special Agent in Charge shall implement this program.

4.4 The Supervisory Inspector and the Office of Investigations Group Supervisor shall supervise the appropriate team composition.

4.5 The Outbound Enforcement Team shall identify, interdict, and investigate export violations.

5 PROCEDURES.

5.1 Port Directors and Special Agents in Charge shall conduct a joint annual Outbound Risk Assessment to determine potential export violations.

5.2 The local annual Outbound Risk Assessments shall include analysis of seizure activity, investigations and intelligence on changing patterns in the following areas: money laundering, interdiction of drug profits, munitions and weapons, chemicals used in the manufacture of illegal narcotics, stolen vehicles, critical technology, non-proliferation, hazardous materials, embargoes, commodity sanctions, and national security issues. The Outbound Enforcement Teams shall prioritize their work according to the local Outbound Risk Assessment, available intelligence, and workload requirements.

5.3 All local annual Outbound Risk Assessments will be reviewed by the Assistant Commissioner, Office of Field Operations, and coordinated with the Office of Investigations at the national level by the Director, Outbound Programs. New or revised risk assessments are due on October 1, at the beginning of each fiscal year.

5.4 Once the risk has been identified, the Outbound Enforcement Teams shall utilize all available automated and non-automated mechanisms to target outbound activities for examinations and investigations. Teams are responsible for actively developing and identifying information and targets for inclusion into outbound database systems, as appropriate.

5.5 The Port Directors and Special Agents in Charge will meet quarterly to review and evaluate the performance of the Outbound Enforcement Team.

5.6 At locations where dedicated teams do not exist or threat is minimal, Port Directors
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and Special Agents in Charge shall conduct joint quarterly enforcement operations to verify the validity of the annual Outbound Risk Assessment.

5.7 The Outbound Enforcement Team shall conduct outreach programs that will focus on source development of financial institutions, the trade community, freight forwarders, technology manufacturers, and other entities which could assist in detection of the illegal transportation of monetary instruments, munitions, high technology shipments, and illegal exports.

5.8 The Outbound Enforcement Teams will be co-located at the same site whenever possible.

5.9 Assignment and rotation of Office of Field Operations personnel to the Outbound Enforcement Team will fall under the purview of the National Inspectional Contraband Enforcement Team Directive.

5.10 The manager of the Outbound Enforcement Team will ensure that all members receive local training to conduct outbound enforcement operations.

5.11 The Port Directors and Special Agents in Charge will ensure that the appropriate personnel and number of team members acquire secret clearances in order to process intelligence community classified information for outbound enforcement purposes.

6 MEASUREMENT.

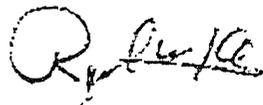
6.1 Work-hours dedicated to outbound activities for Field Operations personnel.

6.2 Case-hours dedicated to outbound violations for special agents.

6.3 Number of seizures relative to threats identified (type of export violation).

6.4 Number of cases relative to threats identified.

6.5 Number of arrests and type of export violation.



Commissioner of Customs



MEMORANDUM OF ACTIVITY



Case Number: 2002-0019	Reporting Office: Miami Field Office	Type of Activity: Personal Interview
Date of Activity: 02/12/2002	Time of Activity: 11:05 A.M.	Location of Activity: Customs Cargo Building 6601 NW 25 th Street, Suite 222 Miami, Florida 33152
Subject of Activity: Eileen DeSanto Senior Inspector, GS-11 Outbound Inspections United States Customs Service Miami International Airport Miami, Florida	Activity Conducted By (Name(s) and Title(s)) Jennifer L. Ducey, Special Agent	Signature(s) and Date(s) Signed: <i>Jennifer L. Ducey</i> <u>February 14, 2002</u>

On February 12, 2002, the OIG interviewed Eileen DeSanto, Senior Inspector, GS-11, Outbound Inspections, United States Customs Service (USCS), Miami International Airport (MIA), Miami, Florida, regarding allegations that USCS managers were providing advance notification to American Airlines (AA) and other airlines prior to conducting outbound inspections. DeSanto provided the following information:

DeSanto stated to date ALM, Avianca, ACES, and Air France Airlines are no longer receiving advance notification of inspection of outbound flights. Specifically with regards to AA, DeSanto stated they are still receiving advance notification, approximately 1-1 ½ hours prior to the inspection. DeSanto stated J.R. Russell and Wayne Russell Senior Inspectors, USCS, were still providing AA with the advance notification. When asked who at AA Russell and Russell were contacting, DeSanto stated AA Security. DeSanto further stated she only knew the first names of the individuals at AA Security, naming them as Mitch and Lala.

Reviewed By (Initials): DB Date: 2/14/02

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Date Printed: 2/14/02
OI Form-09 (10/01)

Office of Inspector General - Investigations
Department of the Treasury



STATEMENT



STATEMENT OF: Eileen DeSanto PAGE 1 OF 2 PAGES

I, Eileen DeSanto, hereby make the following free and voluntary sworn statement to Janet Dwyer, who has identified him/herself to me as a Special Agent with the Office of Inspector General, United States Department of the Treasury.

1 To date 2/12/02 American Airlines is still being
2 notified by some Team Leaders like prior notices before
3 our Outbound Examination and also agreed upon by
4 Customs Mgmt to X-Ray bags in American Airlines Pitt
5 Area - only at Pier I, missing any transfer bags
6 and had to tail logs. Team Leaders are advised
7 to call AA Security before on Outbound Examination
8 to AA Security Mitch, LaPa or Ric. Carter & Tony
9 Morreco to advise them of our presence on the jetway.
10 During Passenger boarding AA Security flood the jetway
11 meeting an officer safety issues, the inspectors are
12 counting money on the floor and our weapons are exposed.
13

Witness' Initials: [Signature]

Initials: [Signature]

County of: Dade

Date/Time: 2-12-2002 TO: 11:20 A.M.

State of: Florida

Location: 10100 NW 25th St, Miami

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STATEMENT



I have read this statement of 2 pages. It is true, accurate, and complete to the best of my knowledge and belief. I have initialed each page, where necessary, and have been given an opportunity to make any corrections or additions. I have also initialed each line where a correction has been made.

Peter M. DeSantis
(Signature)

Subscribed and sworn (or affirmed) to before me this 12th day of February, 2002,
at Miami (City), FL (State).

John A. ...
Special Agent
Department of the Treasury
Office of Inspector General
Office of Investigations

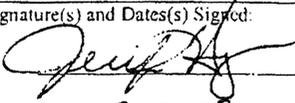
Witness: *[Signature]*

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MEMORANDUM OF ACTIVITY



Case Number: 2002-0019	Reporting Office: Miami Field Office	Type of Activity: Personal Interview
Date of Activity: 02/12/02	Time of Activity: 10:20 A.M.	Location of Activity: Miami International Airport Miami, Florida
Subject of Activity: Airline Contacts ACES, Air France, ALM, and Avianca Airlines Miami International Airport Miami, Florida	Activity Conducted By (Name(s) and Title(s)) Jennifer L. Duey, Special Agent	Signature(s) and Dates(s) Signed:  <u>2-13-02</u>

On February 12, 2002, the OIG interviewed airline representatives regarding allegations that United States Customs Service (USCS) managers were providing various airlines at Miami International Airport (MIA) with advance notice prior to conducting outbound inspections.

Rhonda Shire, Regional Manager, Aerolineas Centrales de Colombia SA (ACES Airline), MIA, stated for routine inspection of outbound flights they have never received, nor are they currently receiving any advance notice from the USCS. Shire further stated the only time they are notified in advance is when USCS has a particular person they are looking for, the airline will pull that persons baggage and have it waiting at the jetway for USCS to inspect. Shire also mentioned that approximately two (2) years ago, ACES Airline installed computers in the USCS area so that Inspectors could access their passenger lists in advance to determine if specific individuals were on scheduled flights.

Jose Lannefranque, Station Manager, Air France Airline, MIA, stated he has been employed in his current position since 1994. Lannefranque further stated he has never received any type of advance notification of inspection of outbound flights from the USCS. Lannefranque added that the USCS does not conduct very many inspections of Air France flights.

Dave Gibson, Station Manager, Air ALM, MIA, stated he has been the Station Manager with ALM Airlines since 1997. Gibson further stated he has never received any type of advance notification of inspection of outbound flights from the USCS. He also stated that he is the President of the Airline Management Counsel, consisting of numerous airline and USCS representatives. Gibson said this counsel is constantly requesting from USCS they either provide the airlines with advance notification of inspection, or have the adequate personnel and equipment to conduct the inspections. This is due to concerns regarding USCS delaying flights because there are not enough Inspectors to efficiently conduct the inspection.

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MEMORANDUM OF ACTIVITY

Case Number: 2002-0019	Subject of Activity (Brief Description): Airline Contacts	Date of Activity: 02/12/2002
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Antonio Gonzalez, Station Manger, Avianca Airlines, MIA, stated he has been the Station Manager with Avianca Airlines since 1994. Gonzalez further stated he has never received any type of advance notification from USCS regarding the inspection of outbound flights.

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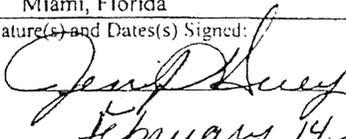
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Office of Inspector General Investigations
 Department of the Treasury



MEMORANDUM OF ACTIVITY



Case Number: 2002-0019	Reporting Office: Miami Field Office	Type of Activity: Telephone Contact
Date of Activity: 02/12/2002	Time of Activity: 2:40 P.M.	Location of Activity: Treasury OIG Miami Field Office Miami, Florida
Subject of Activity: Mitch Segermeister International Security Coordinator American Airlines Miami International Airport Miami, Florida	Activity Conducted By (Name(s) and Title(s)) Jennifer L. Duey, Special Agent	Signature(s) and Date(s) Signed:  February 14, 2002

On February 12, 2002, the OIG interviewed Mitch Segermeister, International Security Coordinator, American Airlines (AA), Miami International Airport (MIA), Miami, Florida, regarding allegations that United States Customs Service (USCS) managers provided advance notification to AA prior to conducting outbound inspections. Segermeister provided the following information:

Segermeister stated if the USCS had a lookout for a particular passenger, they (USCS) would notify AA security approximately 2-3 hours in advance of the inspection. This would allow time for the security team to pull the passenger and secure their bags at the jetway. Segermeister further stated he routinely receives ½ to 1 hour advance notification from USCS regarding "normal" inspections of outbound flights. Segermeister said among others, John and Wayne Russell, USCS Inspectors would page or call him in advance of the inspection.

When asked how did AA benefit from any type of advance notification, Segermeister stated it gives AA security time to look for specific bags and help control passenger flow. Segermeister also said that USCS utilizes AA security to keep other airline employees from interfering with or delaying the inspection. Segermeister stated it is a "professional courtesy" that the USCS notify him (Segermeister) in advance of the inspection.

Reviewed By (Initials): DB Date: 2/14/02

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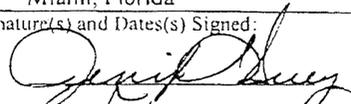
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Office of Inspector General - Investigations
Department of the Treasury



MEMORANDUM OF ACTIVITY



Case Number: 2002-0019	Reporting Office: Miami Field Office	Type of Activity: Telephone Contact
Date of Activity: 02/12/2002	Time of Activity: 3:10 P.M.	Location of Activity: Treasury OIG Miami Field Office Miami, Florida
Subject of Activity: John M Russell Senior Inspector, GS-13 United States Customs Service Miami International Airport Miami, Florida	Activity Conducted By (<i>Name(s) and Title(s)</i>): Jennifer L. Duey, Special Agent	Signature(s) and Dates(s) Signed:  February 14, 2002

On February 12, 2002, the OIG interviewed John M. Russell, Senior Inspector, GS-13, United States Customs Service (USCS), Miami International Airport (MIA), Miami, Florida, regarding allegations that USCS management was providing advance notification to American Airlines (AA) prior to conducting outbound inspections. Russell provided the following information:

Russell stated when Nathaniel Norwood, Chief Inspector, Passenger Processing Unit, USCS, MIA, was Chief of Outbound Operations it was standard procedure for USCS to notify AA in advance of outbound inspections. Russell stated that was an ongoing agreement between Norwood and AA. Currently, Russell stated AA is not given advance notification of outbound inspection of routine flights. Russell further stated the only times advance notification is given is when there is a Be On the Look Out (BOLO) report or when USCS is going to inspect baggage in the baggage room. Russell said this advance notification is done so that AA can re-route the baggage down the correct "belt" that is assigned to the USCS.

Reviewed By (*Initials*): DB Date: 2/14/02

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MEMORANDUM OF ACTIVITY



Case Number: 2002-0019	Reporting Office: Miami Field Office	Type of Activity: Telephone Contact
Date of Activity: 02/13/2002	Time of Activity: 3:55 P.M.	Location of Activity: Customs Cargo Building 6601 NW 25 th Street, Suite 222 Miami, Florida 33152
Subject of Activity: Wayne Russell Senior Inspector, GS-11 United States Customs Service Miami International Airport Miami, Florida	Activity Conducted By (Name(s) and Title(s)) Jennifer L. Duey, Special Agent	Signature(s) and Dates(s) Signed: <i>Jennifer L. Duey</i> February 14, 2002

On February 13, 2002, the OIG interviewed Wayne Russell, Senior Inspector, GS-11, Outbound Inspections, United States Customs Service (USCS), Miami International Airport (MIA), Miami, Florida, regarding allegations that USCS managers were providing advance notification to American Airlines (AA) prior to conducting outbound inspections. Russell provided the following information:

Russell stated that USCS inspectors randomly select the flights on which they will conduct routine outbound inspections on. Russell further stated that no advance notification is given to AA prior to conducting these inspections. Russell also stated the only times AA is notified in advance of an inspection is when AA security is notified because of a Be On the Look Out (BOLO) for a passenger or cargo onboard a specific flight, or if they (USCS) will be x-raying checked baggage. Russell stated AA is notified about the baggage inspection so that the bags can be routed to the USCS designated inspection area.

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MEMORANDUM OF ACTIVITY



Case Number: 2002-0019	Reporting Office: Miami Field Office	Type of Activity: Personal Interview
Date of Activity: 02/12/2002	Time of Activity: 10:40 A.M.	Location of Activity: Customs Cargo Building 6601 NW 25 th Street, Suite 222 Miami, Florida 33152
Subject of Activity: Chester William Olejasz Chief Inspector, GS-13 Outbound Inspections United States Customs Service Miami, Florida	Activity Conducted By (Name(s) and Title(s)) Jennifer L. Duey, Special Agent	Signature(s) and Date(s) Signed: February 14, 2002

On February 12, 2002, the OIG interviewed Chester William Olejasz, Chief Inspector, GS-13, Outbound Inspections, United States Customs Service (USCS), Miami International Airport (MIA), Miami, Florida. Olejasz was interviewed regarding allegations that USCS managers were ignoring Be On the Look Out (BOLO) reports. Olejasz provided the following information:

Olejasz stated when a USCS employee answering the phone receives a BOLO report, they complete a standard BOLO form, containing the name of the caller, what airline the individual (or cargo) is supposed to be on, their itinerary (airline, flight number, date, time, etc) and which supervisor was notified. Olejasz further stated the employee then forwards this form to a supervisor for acknowledgement of receipt, and the form is then put into a three-ring binder under the date of the BOLO (i.e., date the person or cargo is going to be flying). Olejasz said when each shift begins, the inspectors check the BOLO log for that day and work any appropriate leads. Olejasz also stated that once the BOLO has been completed, there is a section on the form for the inspector to complete as to the outcome of the BOLO information.

Olejasz stated the only time that BOLO reports would be ignored is if the USCS is understaffed for that day, the inspectors or the supervisor may pick and choose the "better" BOLO reports to be worked for that particular day. Other than this instance, Olejasz stated he has no knowledge of BOLO reports being routinely ignored or discarded.

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Office of Inspector General - Investigations
Department of the Treasury



MEMORANDUM OF ACTIVITY



Case Number: 2002-0019	Reporting Office: Miami Field Office	Type of Activity: Document Review
Date of Activity: 02/13/2002	Time of Activity: 4:10 P.M.	Location of Activity: Customs Cargo Building 6601 NW 25 th Street, Suite 222 Miami, Florida 33152
Subject of Activity: Be On the Look Out (BOLO) Logs	Activity Conducted By (Name(s) and Title(s)) Jennifer L. Ducy, Special Agent	Signature(s) and Date(s) Signed: <i>Jennifer L. Ducy</i> February 14, 2002

On February 13, 2002, Chester William Olejasz, Chief Inspector, GS-13, Outbound Inspections, United States Customs Service (USCS), Miami International Airport (MIA), Miami, Florida, provided the OIG with copies of the Be On the Look Out (BOLO) logs from MIA dated October, 2001 through February, 2002.

A review of the BOLO logs revealed that a vast majority of the logs were properly completed and printouts of appropriate computer inquiries (i.e., NCIC, TECS, etc) were attached. In addition, the majority of BOLO logs indicated a positive or negative disposition. However, a small number of BOLO logs indicated the BOLO had not been worked. The logs were annotated this was due to a lack of manpower, either because of a seizure on another airline or just simply not enough staff.

Reviewed By (Initials): *DB* Date: *2/14/02*

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