

Statewide Financial Crimes & Abuse Prevention Task Force

Concept Brief from FAST of Vermont – March 5, 2026

Overview

Vermont continues to see a sharp rise in **financial crimes and abuse**, including fraud, embezzlement, cyber-enabled scams, and elder financial exploitation. These cases are complex, cross-jurisdictional, and emotionally devastating for victims.

To ensure a coordinated, expert, and victim-centered response, this proposal recommends creating two subgroups under one umbrella:

Financial Crimes & Abuse Prevention Task Force (FCAP)

- I) **Financial Abuse Special Unit**
- II) **Financial Crimes Investigations Unit**

Financial Crimes & Abuse Prevention Task Force (FCAP) modeled after the proven success of the **Chittenden Unit for Special Investigations (CUSI)**.

The **FCAP** will unite state agencies, law enforcement, prosecutors, regulators, and victim advocates under one umbrella to **prevent, investigate, charge, and prevent financial crimes statewide**.

Mission Statement

The **Financial Crimes & Abuse Prevention Task Force** will be a multi-agency task force that provides coordinated prevention, investigative and prosecutorial services in response to reports of financial fraud, embezzlement, exploitation, and related offenses.

Its mission is to:

- Ensure public accountability for financial crimes and abuse through a multi-disciplinary task force;
- Protect Vermonters from financial harm through coordinated prevention practices;
- Enable successful prosecution through training and professional, evidence-based investigations; and
- Support victims in recovery and justice.

The FCAP operates with professionalism, intelligence, fairness, and compassion, showing special sensitivity to the needs of survivors of financial crimes and abuse.

WORKING DRAFT

I Financial Abuse Special Unit

A submission focused on prevention, education, and strengthening coordinated resources.

Partner Organizations

- Vermont Department of Financial Regulation (DFR)
- Department of Disabilities, Aging & Independent Living (DAIL) / Adult Protective Services (APS)
- Judiciary
- Financial institutions and credit unions
- FAST of Vermont and multidisciplinary community partners
- Other:

Purpose

- Prevent financial exploitation of vulnerable adults and older Vermonters
- Educate professionals, institutions, and the public
- Strengthen coordinated responses among regulatory, judicial, and community partners
- Improve statewide consistency, data-sharing, and early detection

Core Functions

- Develop statewide prevention strategies
- Create public- and professional-facing educational materials
- Provide **LIBRARY of Materials** training to financial institutions, legal partners, and community providers

Structure

- Develop statewide prevention strategies
- Create public- and professional-facing educational materials
- Provide training to financial institutions, legal partners, and community providers

Leadership

- Unit Director / Program Lead
- Deputy Director or Program Coordinator
- Administrative support

Functional Teams

- Prevention & Outreach Team
- Training & Education Unit
- Interagency Coordination Unit
- Data & Reporting Team

Outcomes & Performance Metrics

- Measurable uptake in reporting and referrals
- Coordinated data collection system for reports of financial crime/abuse
- Increased early detection rates
- Improved cross-agency communication
- Higher number of trained professionals statewide
- Reduced incidence or financial loss of financial exploitation cases
- Annual report summarizing activities, data, and recommendations

ADDITIONS:

II) Financial Crimes Investigations Unit

A submission establishing a framework to investigate, charge, and prosecute financial crimes.

Partner Organizations

- Vermont State's Attorneys & Sheriffs
- Vermont Attorney General's Office (AGO)
- Local and Federal law enforcement (FBI, IRS-CI, U.S. Postal Inspector)
- Judiciary
- Financial institutions and credit unions
- DFR: Securities Division
- Other:

Purpose

Established to provide a specialized, coordinated, and highly skilled response to simple and complex financial crimes and abuse across the state.

Core Functions

1. Detect and Investigate Financial Crimes

- Conduct thorough investigations into fraud, exploitation, embezzlement, investment scams, elder financial abuse, and other economic crimes.
- Utilize forensic accounting, digital analysis, and coordinated intelligence gathering.

2. Support Charging and Prosecution

- Develop evidence-based investigative files that support charging decisions.
- Work closely with State's Attorneys, the Attorney General's Office, and federal partners to ensure successful prosecution.

3. Strengthen Interagency Coordination

- Serve as a central hub for collaboration among law enforcement, regulatory agencies, APS, financial institutions, and the judiciary.

- Standardize investigative protocols across sectors.

4. Respond to Emerging Financial Threats

- Monitor trends such as cryptocurrency schemes, online exploitation, romance scams, and cross-border fraud.
- Adapt investigative strategies to rapidly evolving technologies and criminal tactics.

5. Protect Vulnerable Populations

- Prioritize cases involving older adults, people with disabilities, and individuals at heightened risk of financial exploitation.
- Ensure timely intervention to prevent further harm.

6. Enhance Public Safety and Trust

- Promote financial system integrity and public confidence in oversight and enforcement.
- Reduce statewide economic harm through effective enforcement and deterrence.

7. Provide Specialized Expertise

- Offer consultation and technical assistance to local law enforcement and partner agencies.
- Deliver training on investigative techniques, evidence handling, and financial-crime typologies.

Structure

- **Investigate** complex financial crimes using forensic accounting, cyber-analysis, and coordinated intelligence.
- **Support victims** through dedicated advocacy and trauma-informed response.
- **Equip law enforcement** with the software, tools, and training necessary for digital evidence, asset tracing, and data sharing.
- **Provide statewide consistency** and reduce duplication of effort among local agencies.

Investigators will be **non-uniformed professionals** trained in exploitation prevention and digital forensics. The unit will operate from a professional setting separate from traditional police facilities to ensure victim comfort and confidentiality.

Leadership

1. Unit Director / Chief of Financial Crimes

Provides overall strategic leadership, vision, and direction. Responsibilities include:

- Setting investigative priorities and statewide strategy
- Overseeing complex and high-risk cases
- Serving as primary liaison to executive leadership, State's Attorneys, Attorney General, DFR, and federal partners
- Ensuring compliance with statutory authority, reporting requirements, and ethical standards
- Approving policy, protocols, and training initiatives

2. Deputy Director / Assistant Chief

Supports the Director and oversees day-to-day operations. Responsibilities include:

- Supervising investigative teams
- Managing workflow, case assignments, and quality control
- Coordinating interagency task groups and joint operations
- Acting as Director when needed

3. Lead Investigator / Supervisory Investigator

Provides advanced investigative expertise. Responsibilities include:

- Supervising investigators and analysts
- Reviewing case files for completeness and prosecutorial readiness
- Coaching staff on forensic accounting, interview techniques, and evidence development
- Coordinating with prosecutors on charging considerations

4. Forensic Accounting & Analytics Lead

Oversees the financial-analysis function of the Unit. Responsibilities include:

- Conducting high-level financial tracing, asset analysis, and fraud pattern identification
- Guiding investigators through complex financial structures
- Ensuring digital and financial evidence meets evidentiary standards

5. Interagency Liaison / Partnership Coordinator

Strengthens statewide collaboration. Responsibilities include:

- Managing coordinated protocols with APS, DFR, judiciary, law enforcement, and financial institutions
- Serving as the point person for community partners and FAST-related work
- Leading cross-agency trainings and education initiatives

6. Legal & Prosecution Advisor (Internal or Assigned)

A dedicated legal resource (may be embedded or assigned from the AG's Office or SA's Office). Responsibilities include:

- Advising investigators on statutory authority, evidence thresholds, and charging options
- Ensuring cases are developed in prosecutable form
- Supporting warrant preparation, subpoenas, and legal review

7. Administrative Manager / Operations Coordinator

Ensures smooth operations. Responsibilities include:

- Managing records, reporting, compliance, and administrative workflow
 - Tracking statewide metrics and preparing legislative or oversight reports
 - Supporting grant management or funding requirements
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Formation of Statewide Financial Crimes & Abuse Prevention Task Force

Membership will include:

- Law enforcement leadership from multiple jurisdictions
- The State's Attorney's Office and AGO
- Department of Financial Regulation and DAIL
- FAST of Vermont representatives
- Financial institution partners and community advocates

Each agency will contribute personnel, resources, or financial support to sustain **FCAP**.
Potential local Norwich University — to provide shared workspace.

IMMEDIATE ACTION ITEMS

1. Data Management:

Develop systems to collect, analyze, and share information from:

- [Valcour - Detective Corporal Daniel Withrow - 1/15/26](#)
 - AGO and State's Attorneys
 - APS
 - Judiciary
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Statutory Amendments -

1. Define "Cybercrime":

Expand Vermont statute to include AI-related fraud, digital impersonation, and online exploitation. – [Draft complete and attached.](#)

2. Amend Title 8 (Banking and Insurance):

- Authorize financial institutions to hold suspicious transactions for X business days. [Memo sent to House Committee on Commerce and Economic Development Senate Committee on Finance sent on Nov. 14, 2025 from Department of Financial Regulation.](#)
- Permit temporary disabling of online banking in exploitation cases.
- Add a "Trusted Person" designation for account oversight and intervention.

3. Amend UPOA

- To include Authorization to Release Information to drafting attorney if concerns about abuse of POA is suspected – [Draft complete and attached.](#)

4. Amend Title 14 (Probate)

- Any contract transaction executed by Respondent within 6 months on an involuntary guardianship is void on its face. [In process. No draft attached.](#)
- Add Financial exploitation/abuse as a criteria to be disinherited [Draft complete and attached.](#)