

Illegal Marijuana Market Enforcement Grant Program Report

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Oregon Criminal Justice Commission

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Executive Summary

The Criminal Justice Commission (CJC) has administered the Illegal Marijuana Market Enforcement Grant since 2018 and is required to issue annual reports concerning the status and effectiveness of the program and to provide future funding recommendations to the Oregon Legislative Assembly.

Since the last annual report, the grant program was expanded by funds available, eligible recipients of funds, and program purposes. Legislative changes during 2021 and 2022 appropriated \$26 million in special one-time funds, added community-based organizations as eligible grantees, and added a new grant purpose of addressing the ongoing humanitarian crisis associated with worker abuse at illegal cannabis grow sites. Following these changes, the grant program expanded from four law enforcement grantees serving five counties and two cities to 10 law enforcement grantees serving 12 counties and two cities and two community-based organization grantees providing services to trafficked and abused workers statewide.

The CJC, with input from grantees, other agencies, and interested parties, also changed its program data reporting structure, in 2022, to better gauge the problems being addressed with these grant funds. Described in this report, among other things, are the following findings:

- Since April 1, 2022, grant-funded law enforcement operations reported 172 illegal cannabis incidents, occurring in 59 unique zip codes.
- Six zip codes, located in Jackson, Josephine, and Douglas counties, saw 10 or more incidents involving grant-funded law enforcement activities.
- In 38 of the 172 reported incidents (22 percent of those reported), law enforcement observed or suspected that labor trafficking and/or worker abuse was present.
- In the 172 reported incidents, law enforcement observed 218 persons known or suspected to be victims of labor trafficking and/or worker abuse, though whether this figure accounts for 218 unique persons or persons observed on more than one occasion is unknown. At least one child was observed.
- Of the 172 reported incidents, 58 percent resulted in at least one water use violation and 44 percent resulted in at least one building code violation.
- Law enforcement grantees seized approximately 1.3 million illegal cannabis plants and 490,886 pounds of illegal processed cannabis, as well as other illegal narcotics and substances, firearms, and equipment used to operate illegal grows off-grid.

Per the Oregon Legislative Assembly's instruction, the CJC also assessed the funding needs of existing programs at varying levels of services provided, as well as what funds would be needed to expand the program to more jurisdictions. Options for future program investments are described herein.

A copy of the full report is available online at <https://www.oregon.gov/cjc>, or by contacting the Criminal Justice Commission at (503) 378-4830.

Contents

- I. Key Findings Summary 5
- II. Illegal Marijuana Market Enforcement Grant Program Background 5
 - A. Program Origins 5
 - B. Rise in Labor Trafficking and Other Worker Abuse at Illegal Grow Sites..... 6
- III. Status of Funded Programs 6
 - A. 2021-2023 Regular Grant Cycle Grantees..... 6
 - B. 2022 Special One-Time Funding Awards..... 7
 - 1. Law Enforcement Programs 8
 - 2. Community-Based Organization Programs 9
- IV. Program Effectiveness 9
 - A. Measuring Impact — Program Data Tracking and Reporting Revisions in 2022 9
 - B. Data Discussion 10
 - 1. Where Grant-Funded Interdictions Are Happening..... 10
 - 2. Incidents Reported at Repeat Locations / Related to Larger Criminal Organizations 11
 - 3. Areas With Highest Occurrences of Human Trafficking Observed or Suspected 12
 - 4. Seizures Made During Law Enforcement Operations 13
 - 5. Felony Cases Reported 14
 - 6. Civil Enforcement Impacts 15
- V. Future Program Funding Projections 15
 - A. Projections for Funding Existing Programs 16
 - B. Funding Existing Grantees and Expanding the Grant Program to New Jurisdictions 17
 - C. Preview of Unmet Resource Needs Data Collection 18
- Appendix A - All Zip Codes With Reported Illegal Cannabis Incidents..... 20
- Appendix B - Selected Oregon Illegal Cannabis Labor Trafficking/Worker Abuse Media Coverage ... 21

List of Tables and Figures

- Figure 1. Map of Grant-Funded Program Areas 8
- Figure 2. Map of Grantee Incident Density, April 1, 2022 – October 31, 2022 by Zip Code 10
- Table 1. 2021-2023 Regular Grant Cycle Awards 7

Table 2. Combined 2021-2023 Regular and 2022 Special Grant Cycle Awards 7

Table 3. Zip Codes with 10 or More Incidents Reported and Related Location Data 11

Table 4. Zip Codes in which Law Enforcement Grantees Observed or Suspected Persons Were Subjected to Illegal Cannabis-Related Labor Trafficking and/or Worker Abuse 13

Table 5. Seizures Reported During Law Enforcement Operations, July 1, 2022 - October 31, 2022 14

Table 6. Grant-Related Felony Cases, July 1, 2021 - October 31, 2022 15

Table 7. Funding Projection Including Restored Program Reductions for 2023-2025 Biennium 16

Table 8. Funding Projection Including Current Service Levels 17

Table 9. Funding Projection Including Grantee-Requested Program Levels for Two Years 17

Table 10. Funding Projection Including Restored Program Reductions and Program Expansion 18

Table 11. Funding Projection Including Grantee-Requested Levels of Service and Program Expansion 18

Table 12. All Zip Codes With Reported Illegal Cannabis Incidents 20

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I. Key Findings Summary

The Criminal Justice Commission (CJC) has administered the Illegal Marijuana Market Enforcement Grant since 2018 and is required to issue annual reports concerning the status and effectiveness of the program, as well as a new reporting requirement to provide future funding recommendations to the Oregon Legislative Assembly. This year's report features new data reflective of recent changes to the grant program and changes in Oregon's illegal cannabis problems over time. Key findings discussed in this report include:

- Additional grant funds allowed the program to expand from four law enforcement grantees serving five counties and two cities to 10 law enforcement grantees serving 12 counties and two cities, as well as two community-based organization grantees providing services to trafficked and abused workers statewide.
- Since April 1, 2022, grant-funded law enforcement operations reported 172 illegal cannabis incidents, occurring in 59 unique zip codes.
- Six zip codes, located in Jackson, Josephine, and Douglas counties, saw 10 or more incidents involving grant-funded law enforcement activities.
- In 38 of the 172 reported incidents (22 percent of those reported), law enforcement observed or suspected that labor trafficking and/or worker abuse was present.
- In the 172 reported incidents, law enforcement observed 218 persons known or suspected to be victims of labor trafficking and/or worker abuse, though whether this figure accounts for 218 unique persons or persons observed on more than one occasion is unknown. At least one child was observed.
- Of the 172 reported incidents, 58 percent resulted in at least one water use violation and 44 percent resulted in at least one building code violation.
- Law enforcement grantees seized approximately 1.3 million illegal cannabis plants and 490,886 pounds of illegal processed cannabis, as well as other illegal narcotics and substances, firearms, and equipment used to operate illegal grows off-grid.

II. Illegal Marijuana Market Enforcement Grant Program Background

A. Program Origins

In 2014, Oregon voters approved [Measure 91](#), a ballot measure that legalized the recreational use of marijuana under circumstances and in quantities regulated by the Oregon Liquor and Cannabis Commission (OLCC). Measure 91 began allowing legal possession of limited quantities of marijuana for adults 21 and older in 2015 and retail sales, via OLCC-licensed retailers, in 2016.

Despite legal avenues for purchases and sales of marijuana within Oregon, an illegal marijuana market continues to cause public safety concerns, including diversion of marijuana to other states, illegal cultivation of marijuana on private, state, and federal property, enrichment of organized criminal operations, severe environmental degradation, and the emergence of wide-spread coercive labor conditions, including labor trafficking, at illegal grow sites across Oregon.

Illegal market operations and associated labor trafficking remain challenging to investigate and prosecute, given difficulties in drawing empirical distinctions between legal and illegal cultivation and distribution, the industry's cash-heavy operations, workers coerced by threats of imminent personal or familial harm in dangerous, isolated conditions, and the added layer that some of the areas most impacted by illegal operations have long seen their public safety systems under-resourced.

The Oregon Legislative Assembly (legislature) created the Illegal Marijuana Market Enforcement Grant Program (grant program) in 2018 to assist local law enforcement with addressing the illegal marijuana market in Oregon. Since that time, the legislature has expanded the program to also fund disruption of illegal cannabis-related labor trafficking and worker abuse and supports and services for workers encountered. Units of local government (such as law enforcement agencies) and community-based organizations (CBOs) may receive funds through this program.

The legislature currently funds this grant program, on a biennial basis, with \$6 million. In response to a sharp increase in reports of unaddressed illegal grow sites and associated worker abuse in 2021 and 2022, the legislature infused the grant program with an additional \$26 million in emergency one-time funding, which the CJC awarded to grantees in 2022.

B. Rise in Labor Trafficking and Other Worker Abuse at Illegal Grow Sites

Since the grant program's inception in 2018, law enforcement agencies and organizations supporting workers have increasingly encountered persons at illegal grow sites that either affirmatively describe circumstances in which they are forced to work under threat or other coercive circumstances, or, in instances when workers cannot be interviewed, display signs or conditions commonly experienced by trafficked or otherwise abused workers. The grant program was amended in 2022 to prioritize funding of programs that address labor trafficking and support workers escaping abusive and coercive situations. Appendix B, at page 21, features a selection of media coverage of this issue.

III. Status of Funded Programs

A. 2021-2023 Regular Grant Cycle Grantees

During the 2021-2023 regular grant cycle, the CJC awarded grants to four applicants: (1) a combination application supporting the Jackson County Sheriff's Office and District Attorney's Office, and the Medford Police Department; (2) the Deschutes County Sheriff's Office and District Attorney's Office, and the Bend Police Department; (3) the Josephine County Sheriff's Office and District Attorney's Office; and (4) a joint county application supporting the Polk County and Yamhill County Sheriffs' Offices. These grantees were allocated \$5,650,000 to support illegal cannabis interdiction efforts, such as law enforcement and prosecutor personnel positions and overtime, specialized equipment and training opportunities, among other illegal cannabis-specific program needs. Grantees may spend these regular biennial funds through the end of 2023.

Table 1. 2021-2023 Regular Grant Cycle Awards

Organization(s)	2021-2023 Grant Award
Deschutes County and City of Bend	\$ 556,089.28
Jackson County and City of Medford	\$ 2,567,704.00
Josephine County	\$ 1,883,226.00
Polk and Yamhill Counties	\$ 642,980.72
2021-2023 Grant Cycle Funds Awarded	\$ 5,650,000.00

B. 2022 Special One-Time Funding Awards

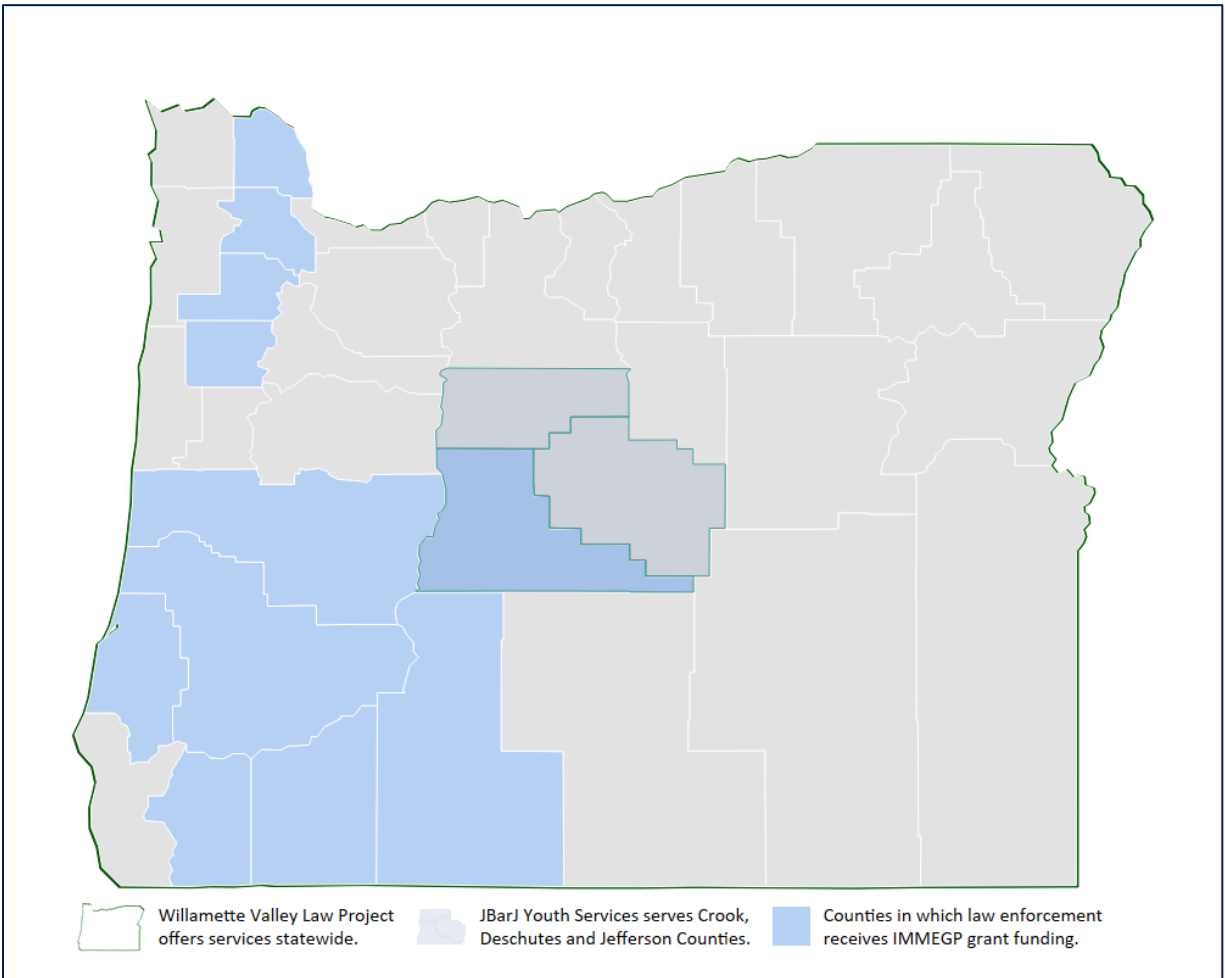
Following the infusion of \$26 million in emergency one-time grant program funds, the CJC opened a supplemental application and allowed existing and newly eligible applicants to compete for those funds. Of the \$26 million, at least \$6 million was required to be awarded to CBOs.

The CJC received 12 applications for these funds, including additional requests from the four existing grantees and eight new applications from six law enforcement applicants and two CBO applicants. The amount requested totaled \$38,785,802, nearly \$12.8 million more than was available. Table 2 below shows the amounts awarded to each grantee through the special grant cycle and the total awarded to grantees through both regular and special grant cycles (combining regular grant cycle and special grant cycle award for the four existing grantees). In total, the CJC has awarded \$31,650,000 in illegal cannabis interdiction funds during 2021 and 2022.

Table 2. Combined 2021-2023 Regular and 2022 Special Grant Cycle Awards

Organization	2022 Special Grant Award	All Grant Funds Awarded 2021-2022
Columbia County	\$ 936,516.37	\$ 936,516.37
Coos County	\$ 223,214.30	\$ 223,214.30
Deschutes County	\$ 1,142,660.72	\$ 1,698,750.00
Douglas County	\$ 581,440.04	\$ 581,440.04
Jackson County	\$ 7,495,191.81	\$ 10,062,895.81
Josephine County	\$ 3,864,603.72	\$ 5,747,829.72
Klamath County	\$ 2,678,704.60	\$ 2,678,704.60
Lane County	\$ 1,927,601.08	\$ 1,927,601.08
Polk/Yamhill Counties	\$ 1,060,029.83	\$ 1,703,010.55
Washington County	\$ 90,037.52	\$ 90,037.52
J Bar J Youth Services	\$ 390,000.00	\$ 390,000.00
Willamette Valley Law Project	\$ 5,610,000.00	\$ 5,610,000.00
Total	\$ 26,000,000.00	\$ 31,650,000.00

Figure 1. Map of Grant-Funded Program Areas



1. Law Enforcement Programs

The grant program currently funds 10 law enforcement grantees, representing 12 counties and two cities, for a total of \$25.6 million in program funds currently allocated to law enforcement programs. These programs employ 38 sworn law enforcement personnel, eight non-sworn personnel, and six prosecutors, in whole or in part, dedicated to addressing illegal cannabis criminal activity. The grant also funds six code enforcement, one waste department, and two county counsel employees supporting law enforcement investigation efforts. In total, 60 personnel are employed through grant funds to work illegal cannabis criminal and civil investigations and prosecution. These personnel cost approximately \$20.3 million. Additionally, two counties were funded to expand capacity of existing personnel with overtime funds in the amount of \$90,320.04.

In addition to personnel, of particular importance to illegal marijuana interdiction efforts is the use of specialized equipment, supplies, and training opportunities. The grant program currently funds approximately \$1.4 million in specialized equipment and approximately \$700,000 in supplies, which includes items such as skid steers and other large equipment necessary to dismantle illegal grows and clean up hazardous landscapes, as well as thermal imaging cameras, confiscated plant storage

containers, and personal safety equipment, such as protective suits to wear during investigations and destruction operations. Law enforcement programs were also awarded \$272,000 to support program personnel through specialized illegal cannabis-related training opportunities.

2. Community-Based Organization Programs

Since the grant's new CBO eligibility in 2022, the program funds two CBO grantees, supporting seven CBOs across the state. The first CBO grantee, the Willamette Valley Law Project (WVLP), is a consortium of six non-profits, including Raíces de Bienestar, Oregon Law Center, NW Workers' Justice Project, Únete, Centro de Servicios Para Campesinos, and Legal Aid Services of Oregon. Together, these nonprofits are providing comprehensive services to workers, as well as community prevention outreach and education. WVLP was awarded \$5.6 million to fund services personnel and direct aid supports, such as housing, food, transportation, emergency stipends, legal representation, and culturally specific mental health counseling for workers affected statewide by the humanitarian crisis associated with unlawful marijuana cultivation and distribution operations. The second CBO grantee, JBarJ, operates an anti-trafficking program serving Deschutes, Jefferson, and Crook counties. JBarJ was awarded \$390,000 to provide crisis support, trained interpreters, long-term care management, support services, and temporary shelter and necessities to human trafficking survivors identified during investigations.

In total, the CBO grantees fund 13 outreach personnel, three attorneys, and two treatment providers dedicated to supporting victims of illegal cannabis grows. Both programs are continuing to expand coordination with law enforcement teams to ensure that culturally specific supports and services are made available as soon as potential victims of labor trafficking or other worker abuse are encountered during illegal cannabis enforcement operations.

IV. Program Effectiveness

A. Measuring Impact — Program Data Tracking and Reporting Revisions in 2022

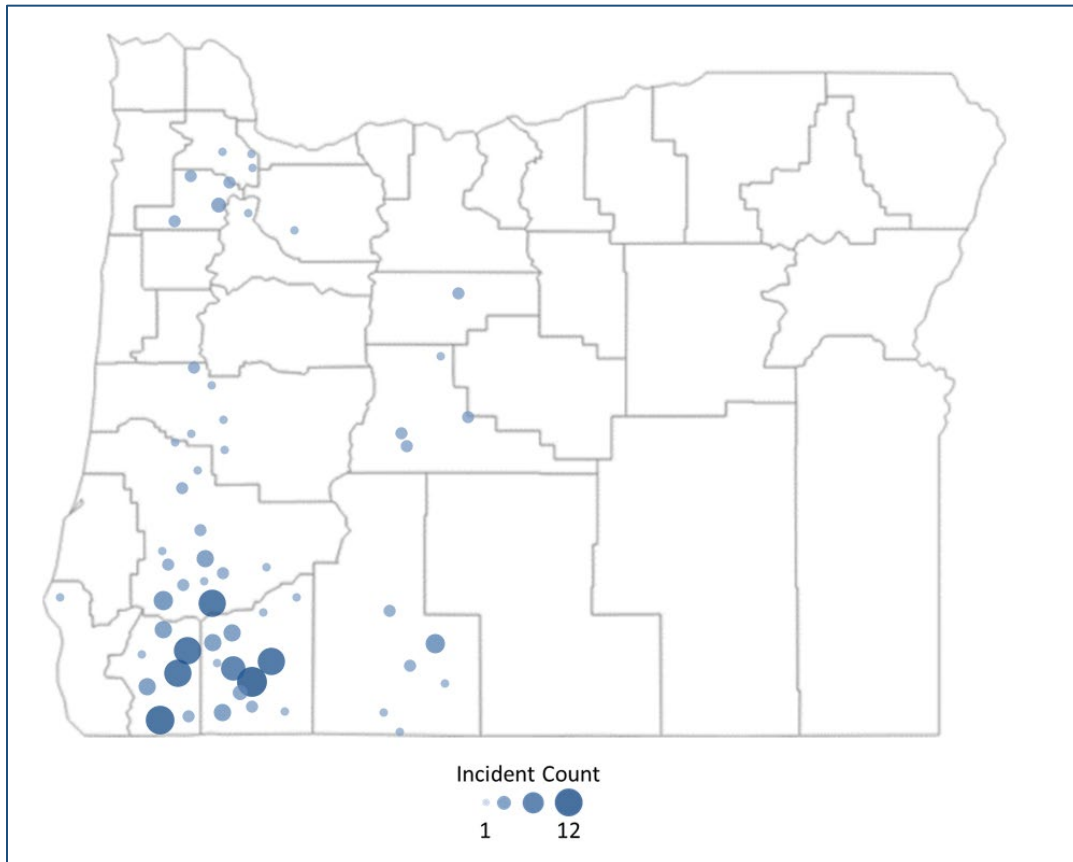
Given the program's recent changes, the CJC evaluated its current grantee data reporting scheme, which was previously focused entirely on law enforcement investigation actions and felony cases prosecuted. With law enforcement and CBO grantee input, the CJC reconstituted reporting requirements to better provide the agency with information necessary to assess the scope of illegal cannabis problems in Oregon, how grant-funded actions are impacting those problems, and the degree to which grant funding adequately assists grantees in addressing them. This report focuses on the reporting from existing and new law enforcement grantees for the period beginning July 1, 2021, through October 31, 2022. Grantees were also asked to submit new incident-specific data points for any grant-funded operations occurring on or after April 1, 2022. Because the CBO grantees are presently engaged in hiring and other foundational program implementation activities, they will begin reporting client services data in 2023. All program reporting is collected on a quarterly basis.

B. Data Discussion

1. Where Grant-Funded Interdictions Are Happening

Figure 2, below, is a map showing the reported law enforcement incidents, by zip code, in 2022. Existing grantees were asked to report incident data from April 1, 2022, to October 31, 2022, while new grantees were asked to report incident data from July 1, 2022, through October 31, 2022.

Figure 2. Map of Grantee Incident Density, April 1, 2022 - October 31, 2022, by Zip Code



A total of 172 illegal cannabis law enforcement incidents – meaning grant-funded law enforcement actions related to large-scale illegal cannabis production or distribution operations – were reported during the new grant reporting period. These incidents occurred in 59 unique zip codes and on one parcel of federal Bureau of Land Management land, where a precise zip code was unknown to investigators. Of the 59 unique zip codes, six zip codes saw 10 or more incidents, with highs of 12 incidents in 97504 and 11 incidents in 97523. Four zip codes saw 10 incidents (97410, 97524, 97526, 97527), one zip code saw eight incidents (97502), and two zip codes saw five incidents (97442 and 97621). Table 3, on page 11, displays the zip codes with the highest number of incidents reported (10 or more) with additional location and population density data. For a table displaying all reported incidents by zip code, please see Table 12, in Appendix 1, on page 20.

Table 3. Zip Codes with 10 or More Incidents Reported and Related Location Data

ZIP Code	Reported Incident Count	Counties Affected	General Location Description	Total Land Area in Zip Code by Square Miles	Population Density Per Square Mile
97504	12	Jackson	Medford east of I-5, south of Central Point to north of Phoenix, including Medford airport	46.73	951
97523	11	Josephine	Cave Junction including land east and west, Holland, Browntown, Takilma, south to CA border	169.6	37
97410	10	Douglas	Azalea along I-5 east to approximately Round Top Lookout	124.41	6
97524	10	Jackson	Eagle Point and areas north and southwest of Medford	309.68	47
97526	10	Josephine	Parts of Grants Pass and areas to north, covering both sides of I-5 to east and west	140.91	243
97527	10	Josephine	Parts of Grants Pass south, plus large areas on either side of Applegate River	237.09	142

2. Incidents Reported at Repeat Locations and/or Related to Larger Criminal Organizations

Key in this year’s reporting were two new pieces of information for the CJC: (1) how many grant-funded law enforcement actions were taken at a location that had been previously visited by law enforcement for illegal cannabis activities; and (2) whether law enforcement investigators knew if the activities encountered during a given incident were related to larger criminal organizations. Of the 172 incidents reported, law enforcement grantees reported that 41 incidents, or 24 percent of total incidents, took place at a location that they had previously encountered during illegal cannabis investigations. Approximately 41 percent of incidents were believed to be related to larger criminal organizations rather than singular illegal operations. Law enforcement grantees were either unable to tell whether an incident was related to larger criminal organizations or were not able to report data on that question in approximately 13 percent of incidents.

Also new to this year’s reporting is information on the number of incidents in which law enforcement grantees observed or suspected that coerced labor and/or trafficked persons were encountered at illegal cannabis operations. Of the 172 incidents reported, trafficking and/or worker abuse was observed or suspected in 38 incidents, or 22 percent of reported incidents. Additionally, in those 38 incidents in which trafficking and/or worker abuse was observed or suspected, law enforcement

estimated observing 218 individuals, including one minor child, who were trafficked or otherwise coerced laborers or suspected of being trafficked or otherwise coerced laborers.

It is unknown whether the approximately 218 individuals observed during the 38 incidents constituted 218 separate individuals or whether the 218 individuals observed were a smaller number of workers seen by law enforcement on more than one occasion. This figure should also be viewed as incomplete, however, as law enforcement grantees also reported incidents in which not enough information was available for them to conclude whether worker abuse was occurring or had occurred. Additionally, law enforcement grantees reported instances in which trafficking was observed or suspected, but the potential victims fled before any contact could be attempted. In those instances, investigators were unable to count or effectively estimate the number of potential workers present.

Law enforcement and CBO grantees have developed, or are continuing to develop, services referral channels so that when law enforcement encounters individuals believed to be trafficked or abused at illegal cannabis grow sites, there is a clear path to making immediate supports and services available. Law enforcement grantees have reported that, even with greater supports and services available to potentially trafficked laborers, some individuals decline to engage with services. The number of persons encountered at illegal cannabis grow sites who are referred to grant-funded services, aggregate demographic information, and the frequency with which individuals engage with or decline these services, are among data points that will become available over time as the CBO grant-funded programs continue to develop their operations.

3. Areas With Highest Occurrences of Human Trafficking Observed or Suspected

Of the 12 counties served through this grant, law enforcement grantees reported having observed or suspected human trafficking or other worker abuse at grow sites in six of them: Deschutes, Douglas, Klamath, Lane, Jackson and Josephine counties. Jackson and Josephine counties reported encountering the most persons observed or suspected of having been trafficked, accounting for 193 of the 218 observations. Law enforcement grantees also reported instances where no persons were observed during an incident but that investigators nevertheless saw signs that persons had been living on-site in substandard or dangerous conditions previously.

Table 4, on page 13, displays the zip codes in which law enforcement grantees observed or suspected persons to have been labor trafficked or subject to worker abuse at illegal cannabis grow sites and the approximate number of persons observed during all incidents in that zip code.

Table 4. Zip Codes in which Law Enforcement Grantees Observed or Suspected Persons Were Subjected to Illegal Cannabis-Related Labor Trafficking and/or Worker Abuse

Zip Code	Counties Affected	General Location Description	Number of Trafficked / Suspected Trafficked Persons Observed	Number of Incidents Where Victims Encountered or Suspected in Zip Code
97502	Jackson	Northeast Jackson County, Central Point	50	5
97523	Josephine	Cave Junction, areas east and west, Holland, Browntown, Takilma, to CA border	42	5
97524	Jackson	Eagle Point, areas north and southwest of Medford	24	8
97530	Jackson	Jacksonville, Applegate southeast to CA border	22	3
97537	Jackson	Rogue River, Wimer, and areas north	22	2
97504	Jackson	Medford east of I-5, south of Central Point to north of Phoenix, including Medford airport	20	4
97532	Josephine	Merlin and areas north and west	10	1
97448	Lane	Junction City and surrounding areas	6	1
97404	Lane	North Eugene along River Road	6	1
97603	Klamath	Areas south and east outside Klamath Falls to CA border	4	1
97624	Klamath	Chiloquin and areas north, east	4	1
97701	Deschutes	Northeastern Bend east of Hwy 97	4	2
97503	Jackson	White City, areas north and east	3	1
97410	Douglas	Azalea, areas northeast and southeast	1	1
97541	Jackson	Trail, McLeod, areas north and west	-	1
97526	Josephine	Grants Pass north of Rogue River up to approximately Hugo	-	1
Totals			218	38

4. Seizures Made During Law Enforcement Operations

Law enforcement grantees reported more than 1.3 million illegal cannabis plants and 490,886 pounds of processed illegal cannabis seized during 2022, by far the most significant amount of illegal cannabis seized during the lifespan of this grant program, shown in Table 5 on page 14. In addition to illegal cannabis plants and processed materials, grant-funded law enforcement operations also encountered other unlawful substances such as fentanyl and methamphetamine, firearms, and vehicles and equipment used in furtherance of unlawful grow operations, such as generators, water pumps, and construction equipment.

Table 5. Seizures Reported During Law Enforcement Operations, July 1, 2021 – October 31, 2022

Unlicensed Cannabis and Derivatives	
Plants	1,316,207
Processed (pounds)	490,886
Edibles (pounds)	404.9
Butane Hash Oil (pounds)	204.11
Keif (jars)	8
Other Illegal Drugs	
Cocaine (pounds)	11.58
Fentanyl (pounds)	12.24
Psilocybin (pounds)	7.72
Methamphetamine (grams)	2,674.04 (5.9 pounds)
Heroin (grams)	141.25 (.31 pounds)
Other Items Seized	
Firearms	254
Money	\$13,075,524.16
Vehicles	145
Properties	21
Generators	13
Water Pumps	10

By comparison, last year’s annual report reflected the grant-funded seizures of 551,004 cannabis plants, 15,776 pounds of processed cannabis plants, and 156 firearms seized. This is an increase, from the last reporting period to the current reporting period, in cannabis plant seizures of 765,203 more plants (139 percent increase), 475,110 more pounds of processed cannabis (3,012 percent increase), and 98 more firearms (63 percent increase), as examples.

Though the expansion of the grant program from four law enforcement grantees covering five counties to 10 law enforcement grantees covering 12 counties accounts for some of this growth, existing grantees also saw seizures of illegal cannabis plants and processed cannabis, among other things, increase during this reporting period.

5. Felony Cases Reported

The CJC also tracks felony cases filed as a result of grant-funded operations. As shown in Table 6, on page 15, during 2022, grant-funded operations resulted in 150 felony cases filed and 10 felony and five misdemeanor convictions reached, with 80 cases still pending disposition at the time of reporting.

Table 6. Grant-Related Felony Cases Reported, July 1, 2021 - October 31, 2022

	July 1, 2021 – October 31, 2022
Total Felony Cases Filed	150
Cases Dismissed	15
Cases Pending (Open)	80
Felony Convictions	10
Misdemeanor Convictions	5

Grantees also reported that, in 14 incidents out of 172 (about eight percent), federal agencies took over disposition of cases in the federal system.

6. Civil Enforcement Impacts

To better calculate the impact that illegal cannabis operations have on communities and their resources, the CJC has also begun collecting information about civil enforcement actions associated with illegal grows sites. Of the 172 incidents reported by law enforcement grantees during the reporting period, approximately 98 incidents (57 percent of those reported) had one or more water code violations observed, such as water theft or illegal use of well systems, and 74 incidents (43 percent of those reported) had one or more building code violations observed (such as electrical code violations). Myriad other civil violations were observed, such as unpermitted cannabis cultivation, illegal camping, and illegal solid waste disposal. In these instances, local and state civil enforcement resources were called upon.

Additionally, the CJC has teamed up with the Oregon Water Resources Department (OWRD) to better assess where water resource violations associated with illegal cannabis operations occur and the types of violations that are occurring. For example, per OWRD collected violation data, more than 150 cannabis-related water use complaints were addressed as of November 2022 by OWRD staff, in addition to the agency’s proactive investigations. Of 104 notices of violation issued by OWRD, 89 (86 percent) were cannabis related.

OWRD staff also assisted law enforcement grantees in 64 illegal cannabis raids. Of those 64 raids led by law enforcement grantees, 21 occurred in Josephine County, 16 occurred in Jackson County, 13 occurred in Douglas County, 13 occurred in Klamath County, and one occurred in Lane County. OWRD issued notices of water use violation in all 64 raids. OWRD also assisted law enforcement in two other cannabis-related raids in Lake County, which is not a program grantee.

V. Future Program Funding Projections

This grant program’s regular program funds amount to \$6 million available every biennium. In 2021 and 2022, \$26 million in special one-time funds were made available to support the program, and permanent changes were made to the eligibility for program funds going forward. Accordingly, the grant program currently funds \$31,650,000 in programs, which is anticipated to fund existing programs at current service levels until December 2025. Of that \$31,650,000, \$25,650,000 was allocated to law enforcement programs, and \$6 million was allocated to CBO programs. Unless additional funds are

appropriated to support the program in future legislative sessions, both law enforcement and CBO grantees will compete for the regular \$6 million in program funds next biennium.

New to the CJC’s annual reporting requirement this year is a requirement to submit recommendations for changes to the funding of this grant program to the legislature’s judiciary committees, per House Bill 4074 (2022 Regular Session). In making the recommendations described in this subsection, the CJC must consider the best available information and projections regarding unlawful marijuana cultivation and distribution operations in this state and any human trafficking related to those operations.

A. Projections for Funding Existing Programs

In providing the funding recommendations required, the CJC took several approaches to assessing the resource needs of existing grantees. The CJC also used resource needs of existing grantees to project what funding might be required should the legislature seek to expand the grant program to new areas of the state.

First, the agency assessed what additional grant funding would be needed to fully fund the current needs of existing grantee programs, or the “restored cuts” path, as shown in Table 7, below. The amount of grant funding that was requested, but not allocated due to insufficient funds during the 2021 regular and 2022 special grant cycles, was approximately \$13.6 million. Of those unavailable funds, approximately \$13.2 million was requested by law enforcement applicants, and approximately \$385,000 was requested by CBO applicants. Thus, to fully cover existing grantee costs through the 2023-2025 biennium, the regular allocation for this grant program would need to be increased by \$13.6 million during the next legislative session. This would cover existing grantees at the resource level expressed during the application cycle but would not allow for new programs.

Table 7. Funding Projection Including Restored Program Reductions for 2023-2025 Biennium

Restored Program Reductions for 2023-2025 Biennium		
Law Enforcement Grantees	\$ 13,210,851.00	<ul style="list-style-type: none"> • Projection for existing grantees to maintain operations at requested funding levels through 2025, only • Does not include funds for new grantees or enhancements for existing grantees
CBO Grantees	\$ 385,161.00	
TOTAL	\$ 13,596,012.00	

Second, the CJC assessed what existing grantees would need to continue their program’s current service levels funded by the existing grant appropriation for two additional years of program work, as shown in Table 8, on page 17. Law enforcement grantees would need an additional grant appropriation of \$14.6 million, and CBO grantees would need an additional grant appropriation of approximately \$3.4 million, for a total of just more than \$18 million in resource needs to fund grantees at their existing service levels for two additional years beyond what has been awarded.

Table 8. Funding Projection Including Current Service Levels

Two Years at Current Levels of Service		
Law Enforcement Grantees	\$ 14,607,204.00	<ul style="list-style-type: none"> • Projection for existing grantees to maintain operations at current funding levels for two years • Does not include funds for new grantees or enhancements for existing grantees
CBO Grantees	\$ 3,428,572.00	
TOTAL	\$ 18,035,776.00	

Lastly, the agency considered a combination of the first and second funding approaches to look at fully funded requested levels of service, rather than funded current service levels, over two additional years, shown in Table 9 below. For law enforcement grantees, this would require an additional appropriation of approximately \$22.2 million. For CBO grantees, this would require an additional appropriation of approximately \$3.65 million. In total, fully funding existing grantees at requested service levels would require a grant appropriation of \$24.9 million (approximately \$19.3 million more than the grant’s regular appropriation).

Table 9. Funding Projection Including Grantee-Requested Program Levels for Two Years

Two Years at Requested Levels of Service		
Law Enforcement Grantees	\$ 21,241,228.00	<ul style="list-style-type: none"> • Projection for existing grantees to maintain operations at requested funding levels for two years • Does not include funds for new grantees or enhancements for existing grantees
CBO Grantees	\$ 3,648,664.00	
TOTAL	\$ 24,889,892.00	

B. Funding Existing Grantees and Expanding the Grant Program to New Jurisdictions

In addition to the existing 12 grantees, the agency is aware of several potential new applicants, interested in the next grant cycle. However, at the time of this report, it is unknown how many new applicants may apply, and it is also unknown as to their prospective service areas or proposed resource needs. To provide a projection of what resources might be required to fund existing and new programs, the CJC looked at what would be required to restore funding reductions made during the regular and special grant cycles, shown in Table 10, on page 18. These projections also include an estimate of funds required to support two new law enforcement grantees and two new CBO grantees, based on grant program request history. For the 2023-2025 biennium, in addition to the appropriation necessary to fund grantees at requested service levels, expanding funds for two new law enforcement programs would require approximately \$3.86 million, while funding two new CBO grantees would

require approximately \$3.65 million. In total, this approach would require a grant program appropriation of approximately \$21.1 million (approximately \$15.5 million more than the grant’s regular appropriation).

Table 10. Funding Projection Including Restored Program Reductions and Program Expansion

Restored Reductions and Expansion Funds	
Restored reductions for 10 existing law enforcement grantees	\$ 13,210,851.00
Funding for 2 new law enforcement grantees	\$ 3,861,432.00
Restored reductions for 2 existing CBO grantees	\$ 385,161.00
Funding for 2 new CBO grantees	\$ 3,648,664.00
TOTAL	\$ 21,106,108.00

To fund existing grantees at their requested levels of service and to expand the program to two new law enforcement grantees and two new CBO grantees would require approximately \$32.4 million (approximately \$26.8 million more than the grant’s regular appropriation), shown in Table 11, below.

Table 11. Funding Projection Including Grantee-Requested Levels of Service and Program Expansion

Requested Levels of Service and Expansion Funds	
10 existing law enforcement grantees at requested levels	\$ 21,241,228.00
Funding for 2 new law enforcement grantees	\$ 3,861,432.00
2 existing CBO grantees at requested levels	\$ 3,648,664.00
Funding for 2 new CBO grantees	\$ 3,648,664.00
TOTAL	\$ 32,399,988.00

C. Preview of Unmet Resource Needs Data Collection

To inform future grant program funding assessments, the CJC has begun asking grantees to estimate the percentage of resources needed to address local illegal cannabis problems that are currently funded by the grant, as well as what other resources are required but unavailable or must be borrowed from other sources. As the CJC has only three months of data reporting on this issue, no assessments as to the grant program’s unmet resource needs are yet available. However, a preview of the

information being gathered may be helpful. First, it is important to know that each grantee's grant program design depends greatly on whether they are an existing or new grantee, the extent to which the jurisdiction or organization in question has resources available for illegal cannabis interdiction, and the type and volume of those resources, as well as other highly localized inputs.

As examples, to date, the amount of grant-funded personnel at incidents reported varied immensely from a high of almost 99 percent (Jackson County, an existing grantee with a prioritization on funding personnel) to a low of 0 percent (Douglas County, a new grantee with a prioritization on funding specialized equipment to support county-funded personnel). Lane and Klamath counties, both new grantees added during the 2022 special funding cycle, reported that no equipment employed during the reporting period was provided by the grant, meaning that all resources necessary to address illegal grow sites was either provided by the grantee or borrowed from another agency. Jackson and Josephine counties, existing grantees, reported that 75 percent and 25 percent, respectively, of equipment necessary to address illegal grow sites was grant-funded. Even for existing grant programs, jurisdictions still rely on local resources (agency-provided or borrowed from other entities) to address illegal grow sites. Examples of equipment that law enforcement grantees would have deployed, had it been available, includes drones for aerial surveillance, on-site narcotics analysis test kits, and evidence transport vehicles. The CJC will continue to refine this resource-needs reporting during 2023 to better assess, to the greatest extent possible, how much of Oregon's illegal cannabis problem is being addressed through these grant-funded programs.

At the time of this report, the program's CBO grantees were engaged in implementation work such as hiring and onboarding new staff. The CJC will assess unmet CBO resource needs during future reporting periods.

Appendix A.

Table 12, below, displays the 59 zip codes in which law enforcement grantees reported illegal cannabis incidents occurring on or after April 1, 2022 to October 31, 2022, and their corresponding county locations, ranked from the zip code with the highest number of incidents (97504), descending to the 25 zip codes with one reported incident.

Table 12. All Zip Codes in which Law Enforcement Grantees Reported Illegal Cannabis Incidents

Total Incident Count	Number of Zip Codes Affected	Zip Codes Included	Counties Affected
12	1	97504	Jackson
11	1	97523	Josephine
10	4	97410, 97524, 97526, 97527	Douglas (1), Jackson (1), Josephine (2)
8	1	97502	Jackson
5	2	97442, 97621	Douglas, Klamath
4	6	97457, 97503, 97530, 97537, 97497, 97538	Douglas (1), Jackson (3), Josephine (2)
3	2	97501, 97114	Jackson, Yamhill
2	17	97701, 97707, 97741, 97739, 97462, 97496, 97470, 97429, 97469, 97540, 97544, 97624, 97639, 97448, 97378, 97148, 97132	Deschutes (3), Jefferson (1), Douglas (5), Jackson (1), Josephine (1), Klamath (2), Lane (1), Yamhill (3)
1	25	97756, 97499, 97757, 97424, 97481, 97484, 97476, 97435, 97417, 97541, 97536, 97520, 97525, 97532, 97633, 97623, 97603, 97404, 97451, 97426, 97113, 97224, 97071, 97038, 97005	Douglas (5), Jackson (4), Lane (4), Klamath (3), Washington (3), Deschutes (1), Curry (1), Jackson (1), Marion (1), Clackamas (1)

Appendix B. Selected Oregon Illegal Cannabis Labor Trafficking/Worker Abuse Media Coverage

- Battaglia, R. (2022, June 16). *Human trafficking a major problem in southern Oregon's illegal cannabis industry, according to officials*. Oregon Public Broadcasting. Available at: <https://www.opb.org/article/2022/06/16/human-trafficking-southern-oregon-illegal-cannabis-industry-law-enforcement-challenges/>.
- Fertig, N., & Mueller, E. (2022, October 2). *'Real people that we care about are being exploited.'* POLITICO Magazine. Available at: <https://www.politico.com/news/magazine/2022/10/02/weed-cannabis-undocumented-immigrants-00059827>.
- Howard, J. (2022, October 21). *Oregon adds human trafficking rule to licensed marijuana requirements*. KDRV NewsWatch 12. Available at: https://www.kdrv.com/news/oregon-adds-human-trafficking-rule-to-licensed-marijuana-requirements/article_b7957192-5191-11ed-8360-d32b557958f9.html.
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- Weintraub, A., Wagschal, G., Kipreos, C. B., Serratos, O., & Myers, A. (2022, December 15). *'Narco slaves:' Migrant workers face abuse on Oregon's cartel-run, illegal pot farms*. ABC News. Available at: <https://abcnews.go.com/US/narco-slaves-migrant-workers-face-abuse-oregons-cartel/story?id=95069523>.
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