

Building a 21<sup>st</sup> Century DA's Office:  
The Bucks County District Attorney's Office  
2026 Transition Report



## A Note from the Transition Committee Chairs

Shortly after Joe Khan was elected as Bucks County's 35th District Attorney, he asked us to chair his Transition Committee, then comprised of 11 seasoned attorneys with a wide range of legal experience. In the weeks before Mr. Khan was sworn in, he enlisted our help to interview the Office's 100+ employees, initiate outreach to stakeholders, and provide an initial assessment of the organization from the outside.

After DA Khan took office, our composition and mission evolved. The Bucks County District Attorney's Office Transition expanded to include not only alums of the Bucks County District Attorney's Office but also staff who currently work there as well as subject matter experts in labor issues, consumer protection, and environmental justice. Over the next 120 days, these Transition Committee members met, conducted research, reviewed records, consulted with Office employees, received public input, and provided the substantive recommendations which helped us prepare this report. The Committee conducted its work in person, virtually, and over the phone and through subcommittees focused on issues such as criminal justice, labor, consumer protection, environmental justice and office management. After the Committee finalized its work, we drafted and submitted this final report.

We thank the following individuals for their time, talents and contributions to this important document:

Irv Acklesberg  
Mark Aronchick  
Irwin Aronson  
Jonathan Berger  
Derek Cohen  
Lyana Cuadrado  
George Donnelly

Mark Freed  
Elizabeth Giuliano  
Bill Goldman  
Sara Hammond  
Kelsey Hannah  
Sarah Heimbach  
Charles Nier

Robert O'Brien  
Elizabeth Oquendo  
Melissa Muroff  
Gabriella Simonelli  
Antonetta Stancu  
Arthur Steinberg  
Gwendolyn Stoltz  
Tom Tosti

We are also thankful to have had the opportunity to serve as the chairs of District Attorney Khan's Transition Committee and the authors of this report. We are proud to submit this report, which we hope marks the beginning of a new era of excellence for the Bucks County District Attorney's Office.

Respectfully submitted,



*Brendan Flynn*



*Thomas J. Jennings --June 2026*

# Table of Contents

A Note from the Transition Committee Chairs _____	2
Table of Contents _____	3
Introduction _____	5
Public Protection _____	6
Where we started _____	6
Where we are going _____	7
1. Secure funding to protect workers, consumers and the environment. _____	7
2. Act now to protect workers, consumers and the environment _____	8
3. Solidify relationships with advocates for workers, consumers and the environment _____	9
4. Leverage the DA's profile to advocate for workers, consumers and the environment. _____	10
Prosecution Policy _____	12
Where we started _____	12
Where we are headed _____	13
1. Create an infrastructure for rooting out corruption _____	13
2. Prioritize Elder Justice as a multidisciplinary focus _____	14
3. Allocate prosecutorial resources more appropriately _____	15
4. Establish policies to guide prosecutorial discretion in key areas _____	16
Office Management Recommendations _____	19
Where we started _____	19
Where we are headed _____	20
1. Clarify responsibilities and chain of command _____	21
2. Implement best practices to retain valued staff and recruit new talent _____	21
3. Reorganize the Detective Division for optimal performance _____	22

4. Create an organized, open and collaborative workspace _____	23
Outreach and Communications _____	25
Where we started _____	25
Where we are going _____	25
1. Release reports which can help protect the public _____	26
2. Build stronger ties with the community in Year One _____	27
3. Modernize the Office's social media outreach _____	28
4. Engage the public in new ways _____	29
Conclusion _____	30

## Introduction

On November 4, 2025, Joe Khan was elected Bucks County District Attorney, winning more votes for that office than any candidate in history and a mandate to fulfill his promise to “move the DA’s Office into the 21<sup>st</sup> century.” This theme resonated with voters who felt frustrated by the Office’s lack of action on issues as diverse as public education, water pollution, and political corruption. As the saying goes, elected officials must campaign in poetry and govern in prose. Thus, mapping out a strategy for modernizing the Office was no easy feat.

DA Khan drew on his broad and diverse relationships to assemble a truly impressive committee of practitioners, experts, and innovators to approach this task from many angles. Labor advocates addressed worker protection, environmentalists made recommendations on fighting pollution and consumer advocates assessed the potential to fight unfair business practices. Alums of the Office identified policies in need of reform and alums of other offices suggested best practices that have been adopted elsewhere. And yet across focus areas, there was a remarkable overlap in the findings and recommendations of the various subcommittees.

While many facets of the Office need improvement, the Office has remarkable strengths that provide a strong foundation for future success. Top caliber personnel serve across practice areas, enduring frustrations and setbacks because of their dedication to service. Office initiatives such as the Internet Crimes Against Children (ICAC) Task Force, are the envy of other DA’s Offices and a model for others to follow. And while people had become accustomed to practices which may have grown outdated over time, most employees were open to reform if implemented properly.

We have synthesized the Committee members’ various findings into recommendations organized under the following four topics:

Public Protection

Prosecution Policy

Office Management

Outreach and Communications

These recommendations, along with a supporting rationale, are offered below.

## Public Protection

Since 2025, the federal government has been retreating from historical commitments to workers, consumers and the environment even as the public welfare is threatened by corporate misconduct. New approaches are required to fill these gaps, making now exactly the right time for District Attorney's Offices to take a more holistic view of what it means to protect their residents. While continuing the traditional criminal prosecution programs that are familiar to most, DAs also should take action to address harms like pollution, mistreatment of workers, and companies that endanger children. DA Khan is well suited to not only take on this challenge in Bucks County but also to create a model for DAs across the Commonwealth. This will require a "Public Protection" apparatus in the DA's Office that innovates its existing infrastructure and expertise to ensure that Bucks County residents are kept safe from the harm perpetrated by corporations who break the law.

## Where we started

Historically the attorneys in the Office, as in most counties, were asked to focus on violent crime and other commonly charged criminal offenses without addressing the office's power to enforce worker, consumer and environmental laws (which are mostly published outside of the Crimes Code familiar to all Pennsylvania prosecutors). In some instances, the Office had agreed to join the national litigation against corporations responsible for national crises such as opioid abuse, PFAS pollution and social media addiction. Without a proactive vision for tackling these problems, however, the Office was only able to address these issues when well-resourced law firms agreed to include the DA among its long list of clients receiving services on a contingent basis. Thus, many smaller scale consumer protection abuses in Bucks County have gone unaddressed due to lack of resources, expertise and attention from the Office. The Office lacked any infrastructure whatsoever to protect workers from misclassification and other abuses. Moreover, despite significant threats to the natural resources beloved by residents across Bucks County, the Office had no plan for leveraging its authority to address environmental justice. This vulnerability was exposed for the world to see in 2025, when the Energy Transfer pipeline leak poisoned the drinking water of Upper Makefield Township, and the Office relinquished its power to prosecute, deferring instead to state and federal authorities.

The Office can and must do better. Not only do Bucks County residents have a right to clean air, pure water, and the preservation of the natural, scenic and historic values of

the environment that surrounds them, the Pennsylvania State Constitution designates officials like the DA as trustees of our natural resources. Similarly, consumers and workers in Bucks County should expect their District Attorney to fight for them using his authority under criminal and civil law. This is especially true because DA Khan not only campaigned on expanding the mission of the office to address issues like these, but because he has the legal experience necessary to institute a plan to protect workers, consumers and the environment.

## Where we are going

Many Pennsylvania laws which protect workers, consumers and the environment give enforcement power to both the Attorney General and the county District Attorneys. Although the Pennsylvania Attorney General's Office has enforced many of these laws, most often under the auspices of its Public Protection Division, most District Attorney's Offices lack the infrastructure to even open up investigations in these areas. It may be reasonable to expect the Attorney General's Office to take on large cases with a statewide impact, but it is not realistic to assume that the Attorney General will have the capacity to address smaller cases in the 67 counties of Pennsylvania. Bucks County's new District Attorney is not only a seasoned criminal prosecutor, he has extensive experience fighting for workers, consumers, and the environment as a civil attorney. At a time of imminent need, therefore, DA Khan can not only enforce these powers to protect Bucks County but also create a blueprint for DAs across the Commonwealth and beyond. This will require hard work, strategic planning, and resources to embrace this new mission. To create a sustainable "Public Protection" infrastructure in the Office, the Transition Committee recommends that the DA adopt the following recommendations:

### 1. Secure funding to protect workers, consumers and the environment.

#### **A. Apply for new grants to support this work**

The Office should take a fresh look at opportunities from DCED, DOJ and other sources who have already invested in the success of the Office. The DA and the executive committee should leverage their strong relationships with potential funders (especially in the environmental and labor movement), and explore new relationships with others, to explore opportunities for funding new positions.

#### **B. Earmark litigation recovery dollars for public protection infrastructure**

A strong affirmative litigation program should be self-sustaining. For example, any recovery (resulting from either settlement or trial) from the Office's pending litigation

relating to price fixing and PFAS chemicals should be used to ensure that the Office can continue to take legal action to protect consumers and the environment

**C. Plan a 2027 budget that reflects the goals and needs of the Office**

By the fall of 2026, the DA should be prepared to recommend to the County Commissioners a proposed budget for 2027 that will equip the Office to better protect workers, consumers and the environment.

**2. Act now to protect workers, consumers and the environment**

**A. Repurpose existing resources to protect workers**

The act of misclassifying workers is likely to violate numerous criminal statutes, including insurance fraud laws. The Office should immediately expand its existing insurance fraud prosecution program to protect the public from dishonest employers who profit by cheating workers, government and insurance companies. Moreover, while exploring its bandwidth and authority to take court action, the Office should work collaboratively with county officials and code enforcement to protect workers who are forced to spend a majority of their time in buildings that contain health and safety hazards

**B. Fill a vacant prosecutor position with a consumer protection attorney**

By eliminating some of the inefficiencies identified in this report, the Office should be able to hire an experienced consumer protection attorney who can develop an action to plan to protect Bucks County consumers from issues such as the following:

1. Poor housing conditions in multi-unit buildings;
2. Businesses identified by the Bucks County Consumer; Protection Department that have demonstrated a pattern or practice of using unfair or deceptive business practices;
3. Online companies whose unfair practices endanger children;
4. The sale of unsafe food and substances to children;
5. Used car dealerships;
6. Home improvement contractors;
7. Junk fees and Drip Pricing.

**C. Conduct a comprehensive review of state and local statutes that can be leveraged to protect Bucks Countians’ right to a clean environment**

The DA’s powers to protect the environment are not centralized but rather spread out across a wide variety of titles, state laws, and local ordinances. No blueprint exists for a DA committed to seeking environmental justice, but this DA has the potential to write one. Over time, the Office should build expertise in the patchwork quilt of powerful but rarely used laws which can be used to address a variety of dangers such as illegal dumping, water contamination (PFAS, Lead, PCBs, Lead and Stormwater runoff; groundwater, etc.), air pollution, and offensive smells in the air and water.

**3. Solidify relationships with advocates for workers, consumers and the environment**

**A. Build on the DA’s relationships with labor unions**

Labor unions, particularly in the building trades, are often in an excellent position to obtain intelligence about worker misclassification as well as apprenticeship and trades programs that are taking payment without providing training or job opportunities. Organized labor can therefore be an excellent source of case referrals. Accordingly, the DA and his staff should formalize outreach presentations to labor unions, and other specialized groups of non-organized workers (CNA’s, school bus drivers, etc.) for mutual education and collaboration on worker misclassification. They should also meet with statewide labor leaders and membership and contribute to local labor meetings like the Bucks County Labor Council.

**B. Strengthen the Office’s partnerships in the consumer protection space**

The Office should maintain robust partnerships with the Attorney General’s Office, Bucks County Consumer Protection, Better Business Bureau, Legal Aid of Southeastern PA, National Association of Consumer Advocates, and other groups that reach into our community. For example, an Office representative could attend regularly scheduled meetings of Consumer Protection Advocates. The Office should also engage law enforcement and other officials to identify ongoing problems that had not been referred to the Office because they appeared to be “civil matters.”

**C. Leverage the DA’s existing relationships in the environmental space**

DA Khan was elected with strong support from environmentalists because he has a strong record on environmental justice. He should leverage his prior relationships to secure support for the Office’s future environmental work. The Office should partner with local attorneys and nonprofits throughout the County who have a pulse on important environmental issues and can provide initial guidance and expertise to build out an environmental crime prosecution program. The Office also should create an organizations and agencies ecomap to identify referral sources and partners for cases.

**4. Leverage the DA’s profile to advocate for workers, consumers and the environment.**

**A. Advocate for legislative reforms that align with the Office’s priorities**

The DA has a unique background in both civil and criminal practice, having served as Bucks County Solicitor – the County’s chief civil legal officer – before taking office as Bucks County District Attorney – the County’s chief law enforcement officer. He has drafted legislation to protect workers, consumers and the environment and has worked with legislators to enact and enforce such laws. Leveraging his experience and relationships, the DA should engage with legislators at the state, local, and federal level to provide comments and insight on legislation and regulations that impact the Office’s public protection priorities.

**B. Submit amicus briefs to advocate for workers, consumers and the environment**

The Office should collaborate with partner organizations, non-profits, and government agencies – especially other District Attorneys – to identify opportunities for amicus curae (“friend of the court”) briefs that can impact the resolution of litigation affecting workers, consumers and the environment.

**C. Educate the legal community about worker, consumer and environmental justice**

Many lawyers are unaware of the powerful Pennsylvania laws which can be leveraged to protect workers, consumers and the environment. As the chief law enforcement officer for the fourth largest county in Pennsylvania and a former adjunct professor at the University of Pennsylvania Law School, the DA can be a force multiplier on these issues by raising awareness in the legal community. The

DA and his staff should also promote awareness about Pennsylvania laws such as Act 72, the Consumer Protection Law, and the Environmental Rights Amendment through Continuing Legal Education Classes (CLE's), lectures, and other speaking engagements and public events where printed materials can be circulated.

## Prosecution Policy

No District Attorney has unlimited resources. To make the most of its potential, a modern District Attorney's Office should have clear criminal prosecution policies which ensure that its limited resources are focused on prosecuting the right cases, at the right time, and by the right people. These policies should promote the mission and values of the Office, leverage its existing strengths, and encourage growth in areas where improvement is needed. Focus and direction are important for both the organization and its employees alike. Better defined goals and policies will help the DA lead the office into a new era of acting boldly, effectively and efficiently to protect the people of Bucks County.

### Where we started

When DA Khan took office in January, the office was staffed with many talented and dedicated employees, but a lack of focus and structure in overall prosecution policies was causing backlog, inconsistent results, and inefficiencies for detectives, attorneys, and support staff. Too often, low level cases were demanding as much attention from senior prosecutors as high-priority cases. Unwritten, or non-specific prosecution policies created duplicative work, unclear processes, and bogged down attorneys and support staff. In several areas, employees seemed to be running around reacting and "putting out fires" as they arose, rather than acting in accordance with organized and methodical strategies. In many instances, the lack of efficiency and consistency exacerbated the morale, burnout, and retention issues that all prosecutor's offices must address in the 21<sup>st</sup> century.

Important policies needed definition and consistency. With respect to issues such as sentencing, probation, and bail, the Office appeared to have policies that were at worst nonexistent and at best inconsistently followed. The Transition Committee also learned that many cases which were resolved in the Court of Common Pleas could and should have been resolved at the Magisterial District Judge (MDJ) level – as is the practice in many other counties – before resources were invested in preparing the case for trial. Without making judgments as to whether more cases should be resolved by agreement, the Transition Committee recognized that those cases which are appropriate for negotiated resolutions should be resolved as early as possible. Relatedly, the Committee identified inefficiencies in the approval process for Accelerated Rehabilitative Disposition (ARD), which cause unnecessary delays and inconsistent outcomes. Failing to adopt an approach that prioritizes early and efficient resolutions wastes time, resources and energy in preparing cases that should have settled at the earliest opportunity.

As a result of these inefficient and inconsistent practices, the Office has lacked important prosecutorial functions that the public should expect from a 21<sup>st</sup> century District Attorney's Office. When DA Khan took office, there was no ability to introduce cases to the then-expiring grand jury and no plan for empaneling a new one. This missing function was particularly concerning because the people of Bucks County need their District Attorney to root out corruption and to conduct those investigations with integrity and the confidence of the public. And while the Office has done groundbreaking work to protect minors from those who want to hurt children, more needs to be done to protect older residents and marginalized communities who are also at risk of harm because of who they are.

## Where we are headed

The Office must move beyond just reacting to emergencies after bad things have happened and towards a proactive model of anticipating threats, leveraging partnerships, and adopting best practices which are followed in prosecutors' offices across the country. The Office needs a more disciplined and professional approach to tackling corruption, investigating hate crimes, and protecting older residents from physical and economic harm. Policies on important issues, such as pretrial detention, civil forfeiture, capital punishment, and drug delivery resulting in death, need to be established and/or clarified. Accordingly, we make the following recommendations to help sharpen the Office's focus, optimize employee performance, and ensure alignment of values and resources with real time threats to the people of Bucks County:

### 1. Create an infrastructure for rooting out corruption

#### **A. Ensure that investigations of public officials are carried out with integrity**

A Special Investigations Unit (SIU) of attorneys should have a reporting structure that is separate from other trial prosecutors in order to protect the integrity of sensitive investigations, especially those involving allegations of official misconduct. Similarly, a dedicated squad of detectives should handle SIU cases. The Office should utilize its workspace outside the Justice Center for sensitive investigations, such as those into the conduct of law enforcement officers involved in pending cases being litigated in the Justice Center. Whenever possible, investigations of local officials should be assigned to attorneys and detectives who have not worked in or closely with the official or agency under investigation. The DA should explore the possibility of reciprocal agreements with other prosecutors to conduct independent investigations into allegations of official misconduct

**B. Centralize the oversight of allegations relating to official misconduct**

Designate an SIU prosecutor to serve as an ethics and integrity officer, oversee the office's compliance with rules relating to discovery and impeachment, and ensure that the office follows best practices in prosecuting criminal offenses discovered during *Brady/Giglio* reviews. This prosecutor should also oversee independent reviews of convictions where credible evidence of prosecutorial or police misconduct has developed since the exhaustion of traditional appeals (and refer cases for criminal prosecution if warranted).

**C. Seek to convene a grand jury as soon as possible**

While local law enforcement and County Detectives have conducted many complex investigations without the assistance of a grand jury, the fact-finding powers of the grand jury are essential to properly conduct certain investigations into corruption and other sensitive topics. This need is particularly stark in instances when witnesses are reluctant to cooperate with criminal investigations absent the compulsory and confidential nature of a grand jury subpoena.

**2. Prioritize Elder Justice as a multidisciplinary focus**

**A. Develop a comprehensive strategy to better protect older adults.**

County Detectives and attorneys from the Economic Crime, Civil Enforcement and Special Victims units should work together to identify patterns and trends threatening older adult victims in our community, such as: phone/online scams (e.g. romance scams, crypto Scams, gold buyers); door-to-door scams (e.g. home improvement contractors, salespeople); and caregiver physical and sexual abuse and neglect of a care dependent person. The Office should create educational materials and provide presentations to the community on topics affecting older adults like financial abuse and exploitation, caregiver abuse and neglect, scams, and predatory business practices.

**B. Leverage relationships to better address threats to older adults**

The Office should either be a more active participant in the Crimes Against Older Adults multidisciplinary task force or establish a new committee that better addresses criminal threats to senior adults. The Office should work more closely with financial institutions to identify new threats to older adults. The Office should

work closely with law enforcement partners to identify business practices which are unfair to older adults that can be remedied and abated through civil enforcement.

**C. Seek early involvement in fraud cases with older victims.**

In such cases, time is of the essence. Ideally, local police departments would contact County Detectives immediately when handling the intake of alleged economic crimes against the elderly. While the Detective Division does not need to take the lead in every such case, early involvement is necessary to determine whether such involvement could add needed value to the investigation. For example, in certain cases the Office can obtain a temporary restraining order to “freeze” assets that a victim was deceived into parting with, but swift action is necessary before the money is gone forever.

**3. Allocate prosecutorial resources more appropriately**

**A. Ensure that inmates are being appropriately detained at the county jail**

Rather than seek “high” bail for dangerous defendants, such as violent offenders and recidivist DUI offenders who are a danger to themselves and the community, the Office should pursue pretrial detention for cases where no amount of cash bail or other conditions would protect the public. Similarly, while dangerous defendants should be detained without bail, bail recommendations for nondangerous defendants should factor in a defendant’s ability to pay so that wealthy defendants are posting meaningful amounts that will ensure their appearance and indigent defendants are not remaining incarcerated due to lack of resources. Relatedly, the Office should evaluate the current use of probation and detainers and collaborate with Probation and Parole and the Department of Corrections to ensure that evidence-based practices are protecting the public and meeting all other goals of sentencing.

**B. Resolve cases early rather than late**

ADAs should resolve appropriate cases at the MDJ stage rather than in the Court of Common Pleas, where resources are wasted preparing for trials that never happen. Newer ADAs should receive better guidance on when they can make an offer at a preliminary hearing without a supervisor’s approval. ADAs should always have criminal histories at the preliminary hearing. After reviewing diversion policies to ensure that they are current and reflect the office’s priorities and values, the Office

should roll out a file creation checklist with clear eligibility guidelines for diversion. Support staff should be trained in flagging cases for diversion prior to Preliminary Hearings.

The Office should also provide more training to attorneys about the intersection of other laws and the office's exercise of discretion. In certain cases, particularly involving low level drug offenses, local ordinances may provide a charging alternative that is better suited for an appropriate outcome. The Prosecution Policy subcommittee noted that even if a case is eventually dismissed or pled down to reduced charges, the initial charging decision can adversely affect a person's ability to maintain employment, immigration status, or eligibility to serve in the military. Charging attorneys should therefore receive training about trends with collateral consequences which commonly derail plea negotiations.

**C. Review the office's forfeiture policies while clearing out the backlog of cases**

When properly used, civil forfeiture can be an effective tool to keep the County safe. The office should revisit and clarify its policies and guidelines to ensure that forfeiture is pursued in an effective, equitable and strategic manner. In the meantime, the office should clear out the significant backlog of unresolved forfeiture cases that have languished for years. The Office should prioritize the unfinished cases which have resulted in an overflow of physical property at the Evidence Warehouse. Resolving these cases can not only bring in needed resources but will allow for space to be freed up for storage.

**4. Establish policies to guide prosecutorial discretion in key areas**

**A. Drug Delivery Resulting in Death (DDRD)**

DDRD cases can be complicated, and the DA should task attorneys and detectives in the office to create a policy that standardizes how ADAs make decisions on charging and culpability. The DA should evaluate charging decisions in Drug Delivery Resulting in Death (DDRD) cases using a spectrum of culpability with multiple factors. The Prosecution Policy Subcommittee developed specific recommendations to inform the Office's creation of a clear, easy to follow policy that attorneys can reference as they work through these difficult, fact specific cases. Some of the factors that the subcommittee recommended considering include:

1. Whether the offender is a known user with a motive of addiction as compared to a dealer who has a primary motive of profit;
2. Whether the offender received any service or anything of value in exchange for the delivery of the substance;
3. Whether the offender had knowledge that the drugs delivered were fentanyl, xylazine, medetomidine or another deadly mixture;
4. Whether the offender checked on the decedent after delivery, for example calling or sending text messages showing concern, or otherwise tried to help the victim after a potential overdose;
5. Whether the offender knew that others had overdosed on drugs from the same batch or from the same dealer;
6. Whether the offender showed any consciousness of guilt such as flight, hiding or destroying evidence, or lying to or misleading police or Emergency Medical Services;
7. Whether and to what degree impairment impacted the offender's culpability; and
8. Whether the offender cooperated with the investigation.

#### **B. Capital Punishment**

The Office should establish a standing committee, comprised of senior attorneys with experience prosecuting homicide, to submit in each pending first-degree murder case (including capital cases being litigated at the post-conviction level) a recommendation to the DA as to whether the Commonwealth can and should seek the death penalty. This standing committee should follow formal processes and procedures to promote consistency and fairness in the Office's enforcement of all laws relating to capital punishment. For example, the Transition Committee recommends that the Office adopt a policy prohibiting the misuse of death penalty as leverage for obtaining a guilty plea or as pretense for disqualifying potential jurors.

#### **C. Hate Crimes**

Given the increased violence and threats of violence targeted towards people based on their religious, racial/ethnic, or sexual identity, the Office should map out policies and strategies for both proactive investigations and reactive prosecutions of these crimes in Bucks County. Success will require partnering with not only

representatives of law enforcement agencies but also representatives of communities who have been the targets of hate crimes and organizations who are tracking such incidents. It is essential to build trust with these stakeholders before criminal incidents occur. In his first year of office, the DA should visit houses of worship from every faith community in Bucks County, meet with organizations representing the County's diverse ethnic and racial communities, and convene a roundtable, task force, and/or working group to ensure that lines of communication are open.

## Office Management Recommendations

A District Attorney's Office can only be as strong as the people who carry out its mission. The work is critical, challenging and, for many, a calling. Investing in these public servants and their success is a must. From attorneys to detectives to support staff, the 100+ employees of the Bucks County DA's Office require structure, fairness and accountability to carry out its mission. Newer employees particularly need oversight and support. The Office must be especially mindful of the wellness of personnel who repeatedly address emotionally difficult subject matters. While the Office had lost a step in following best practices for modern prosecutor's offices, our new District Attorney has a unique opportunity to provide a fresh start for the hardworking men and women who are the heart of this Office.

### Where we started

As DA-elect, Mr. Khan and his incoming Chief of Staff first visited the Office's main workspace in the Justice Center in December 2025. They were immediately jarred by the dissonance of being cheerfully greeted by a dedicated office of employees who were confined to a cluttered workspace that was often drab, generally disorganized and in some places dysfunctional. Paint was peeling in key places such as the victim/witness room, boxes were haphazardly stacked to the ceiling and littered in hallways, and the Office lacked any directory or other system for organizing the voluminous amount of paperwork, much of which had become redundant or obsolete. Most strikingly, as paper occupied spaces where people should be working together, every member of the Office's storied Detective Division had been relegated to offsite locations since the Office moved to the Justice Center in 2015.

This lack of clarity and cohesiveness was reflected in the management documents that DA-elect Khan received when he requested a basic organizational chart. While some subdivisions of the Office were organized on paper, no such document existed for the organization as a whole. Instead, management relied on a multipage document that listed duties next to the names of personnel assigned to complete those tasks. For attorneys, the title of "Chief" was used to interchangeably describe supervisory responsibilities, subject matter expertise, and in some cases responsibility for ministerial tasks. As the DA-elect spoke with employees, it became clear that many did not know who their direct supervisor was. Not one could clearly illustrate the chain of command for the entire Office. To the extent that a supervision structure existed, it was inconsistently followed and not well

understood. In too many cases, there was no alignment between employees' titles and their actual roles and responsibilities. It was evident that the hardworking and dedicated employees had thrived *in spite of* the Office's structure, not because of it.

While these issues did not arise overnight, it appears that their unchecked ascent contributed to a recent decline in morale and retention in the Office. While recruiting and retaining good employees is a challenge for all prosecutors' offices in the 21<sup>st</sup> century, it was striking that the District Attorney's Office did not have actionable plans for addressing the above issues. Such a lack of focus is not sustainable. For example, while the Office boasts one of Pennsylvania's best programs for prosecuting sexual abuse and exploitation, it lacked any formal system for supporting the mental and emotional wellbeing of the professionals handling those traumatic cases. As a result, some dedicated public servants had been stepping away from these practice areas – or from law enforcement altogether.

Interviews with support staff, detectives and attorneys revealed the strong need for more regular and transparent communication. In many places where connectivity is essential to productivity and positive morale, the Office was separated into silos, exacerbating the lack of open lines of dialogue. Yet among employees, we found a high degree of consensus about the need for changes, as well as a common belief that the prior administration felt that either the status quo was acceptable or that making changes would be too difficult. When questioned about the rationale for practices which seemed outdated and/or unwise, a familiar response was heard from employees from every corner of the Office: "because that's how we've always done it."

## Where we are headed

It was clear to this Committee when the DA started in January that the Office's most important asset was its people. These attorneys, detectives and support staff are dedicated to the mission of the Office but they deserve systems that will bring out their best. Taking care of one's people requires vision, intentionality, and consistency. This would be true at any time, but it is especially important as the Office begins a new era of fulfilling its potential as a law office for the people. Against this backdrop, the Transition Committee has prepared a series of recommendations aimed at supporting the talented and dedicated workforce of the Office. These recommendations will better enable the Office, through its hardworking people, to fully realize its mission of delivering justice to all Bucks County residents in the 21<sup>st</sup> Century.

## 1. Clarify responsibilities and chain of command

### A. Ensure that every member of the office understands their role in the chain of command

Every employee should understand who their direct supervisor is and every supervisor should understand their management and supervisory obligations. The DA should have weekly meetings with supervisors to keep open lines of communication with management and require supervisors to conduct regular meetings with their units, squads and teams to ensure open lines of communication with subordinates.

### B. Create an organizational chart

An organizational chart should provide a clear illustration of the general structure of the office. Where needed, more detailed documents can articulate specific roles and responsibilities that are not evident from the officewide organizational chart. For example, the traditional directory listing the names of each attorney followed by their portfolios, if needed, should be replaced by a document that is grouped by responsibilities and roles.

### C. Invest in management and leadership development

Formal management training is essential to ensure that supervisors provide appropriate supervision, support and accountability for their direct reports. Whenever possible, provide onsite instruction to address supervision skills, time management, and communication. Staff should also seek out management training opportunities through professional associations like the Pennsylvania District Attorney's Association.

## 2. Implement best practices to retain valued staff and recruit new talent

### A. Improve consistency with respect to compensation and performance

The Office should institute standards and processes for attorney evaluations and after-action reviews of trials and other major operations. Criteria should be established for attorney salary ranges based on experience, responsibility and performance. As needed, merit raises can create parity amongst attorneys, especially with respect to lateral hires whose prosecutorial experience outside the office has not been factored into their salaries.

**B. Create new procedures to improve and maintain good morale**

The Office should provide all staff with standardized weekly updates on personnel changes, successful prosecutions, and other noteworthy developments. The DA should leverage his relationships across the Commonwealth to nominate employees for awards, recommend employees to serve on committees, and spotlight employees as leaders in their respective areas of practice.

The Office should also create a wellness committee that will provide support for personnel, particularly those handling special victims unit cases, who are exposed to secondhand trauma. If possible, the DA should bring in a new office dog to succeed “Daisey” upon her retirement.

**C. Optimize the recruitment, onboarding and supervision of junior attorneys.**

During their first 1-2 years in the office, new attorneys should receive focused supervision, experience and support, including a structured orientation process, under the guidance of one or more senior attorneys. The Office also should follow best practices to recruit a diverse and dynamic pool of applicants for internships and attorney positions.

**3. Reorganize the Detective Division for optimal performance**

**A. Open up the hiring process for open positions**

For as long as anyone can remember, the Detective Division followed a tradition of recruiting new members who were already known to the organization rather than allowing new faces to apply for consideration. To ensure that the Office continues to hire the best and brightest in law enforcement, the process should be opened up to allow a diverse pool of qualified applicants to compete for open positions. The DA should conduct an open search for the next Bucks County Chief of Detectives and publicly post vacancies for County Detective to ensure that the organization is able to meet the high standards of excellence set forth in the Division’s mission statement.

**B. Appoint a Chief who will implement a more dynamic and proactive model**

The new Chief of County Detectives should be a dynamic leader who is invested in the Division meeting the highest standards of excellence to ensure that the Office is more proactive in addressing threats to the people of Bucks County. For example,

the Chief should be committed to the Division achieving accreditation from Pennsylvania Law Enforcement Accreditation Commission.

**C. Organize the Detective Division by subject matter expertise**

To improve efficiency, consistency, and collaboration with attorneys, the Division should be organized by subject matter. The detectives in the “Strike Force” should be equipped to work more collaboratively with other County Detectives and should broaden their focus to include not only investigate drug cases but also threats such as firearms and human trafficking. Ideally, lieutenants with subject matter expertise would manage roughly equal numbers of subordinates. As soon as possible, the Detective Division should add one additional lieutenant and 2-3 additional analysts.

**4. Create an organized, open and collaborative workspace**

**A. Re-integrate County Detectives into the main office**

The Chief of Detectives and at least one squad of detectives should maintain full-time onsite offices at the Justice Center to improve communication and foster closer collaboration between attorneys, detectives, and support staff. Ideally, all Office employees would work at the Justice Center. So long as the Office is split into multiple locations, the DA should assign attorneys to work in the buildings currently utilized by Detectives.

**B. Overhaul the shared physical workspace in the Justice Center**

After soliciting feedback from staff, detectives, and attorneys to hear suggestions on how to make the shared workspace more functional and collaborative, the DA should take steps to clean up the clutter and upgrade the space to meet the needs of all employees. The DA should also leverage the cost savings realized from a high vacancy rate in early 2026 to offset the costs of any necessary alterations of spaces which have proven inefficient, impractical, or noncompliant with applicable laws and regulations.

**C. Move towards a paperless system**

The Office should work on a paper management system to eliminate the amount of physical office space dedicated to storage of paper. The Office should work with the Information Technology Division (IT) of the County to operationalize processes that

can cut down on the office's reliance on paper copies. In the meantime, the Office should evaluate potential storage optimization options to remove some of the paper boxes cluttering the office.

## Outreach and Communications

To fulfill its mission of being the “law office of the people,” the District Attorney’s Office must be connected to the people. This begins and ends with trust. While confidentiality is critical to effective prosecution, the people need to know about the work of the Office and to know their District Attorney. Transparency is more than answering questions when they are asked; it requires clear and consistent communication to keep people informed and engaged. Showing up is critical. Staying current with best practices and embracing creative and innovative ideas will help the DA keep the office connected to the people it serves.

### Where we started

Years ago, a poignant and compelling mission statement, describing the office as “the law office of the people,” was mounted outside of the District Attorney’s Office. But few people have read these words unless they have visited the 2<sup>nd</sup> floor of the County Justice Center. A determined visitor might find the text on the Office’s social media platforms, where external communications were disproportionately comprised of press releases with mug shots of criminals. Historically, the Office had strong relationships with law enforcement and other criminal justice professionals, but the Transition Committee found a significant gap in outreach to many diverse communities and organizations that populate Bucks County. Last year, most Bucks Countians did not even know the name of their District Attorney. Even worse, some constituents felt that their schools, neighborhoods, and faith communities were not a priority for the Bucks County District Attorney’s Office.

### Where we are going

The DA needs to interact directly with the people he serves. Relying on social media comments for public input has not only proved to be a poor substitute for direct communications with actual constituents and stakeholders in Bucks County, it has made the Office complicit in the cesspool of toxic content that companies like Meta push to boost revenue. While updating its social media policies, the Office generally should move away from communication tools powered by artificial intelligence and for-profit algorithms. Instead, the Office should engage platforms like podcasts, reels and other new formats while becoming more strategic about its use of existing media tools.

While media strategies are important, there is simply no substitute for showing up for those we serve. Prior DAs made appearances at our schools, houses of worship and community events, but these visits often were disproportionately scheduled during campaign years. The DA should be engaging with these people and institutions throughout the year, not only to communicate the mission of the Office but also to learn how to better serve the needs of the community. This is especially important in the DA's first year in office, as he works to move the Office into the 21<sup>st</sup> century. During this time, the DA should also leverage his profile as the nation's first Pakistani American District Attorney to uplift immigrant communities in Bucks County and repair some of the trust that has been damaged by recent actions by ICE.

Moreover, while DA Khan is a career prosecutor with strong ties to federal and state law enforcement, he is new to many of the local law enforcement partners whose support is essential for the success of the Office. Early and regular outreach to Bucks County police departments and to state and federal partners is essential to maintaining and strengthening the Office's essential partnerships with law enforcement. Moreover, while working with these agencies to investigate wrongdoing, the Office also must take steps to ensure that the applicable secrecy rules for criminal investigations are not misapplied as to withhold important information that needs to be shared to keep the public safe from harm.

## 1. Release reports which can help protect the public

### A. Determine how to lawfully share important investigative findings

When important events occur that appear to implicate criminal laws, the public often receives little or no information from the Office unless an arrest is made. In the past, the Office cited laws such as the Criminal History Records Information Act (CHRIA) as barriers to releasing such information. In such cases, a grand jury report may be necessary to provide the public with important information about wrongdoing that has occurred and the steps that can be taken to prevent future harm. At the same time, the Office should revisit its analysis of CHRIA to determine whether there are permissible ways to share important investigative findings even when no arrest is made and a grand jury has not been convened.

### B. Consider the use of investigative reports in matters of importance where the statute of limitations has expired

For example, a 2018 investigative grand jury report released by the Pennsylvania Attorney General provided the public with critical information about widespread

child abuse in six dioceses of the Catholic Church in Pennsylvania. Despite the expiration of the statute of limitations for most criminal conduct, the information in the report provided the public with invaluable guidance to prevent future harm to children.

**C. Consider the use of investigative reports in matters of importance where reform is needed**

For example, a 2025 investigative grand jury report released by the Montgomery County District Attorney's Office provided the public with critical information about the public health crisis caused by unregulated smoke shops in Southeastern Pennsylvania. Bucks County was one of three counties to participate in this investigation, which was overseen by the Montgomery County District Attorney.

**2. Build stronger ties with the community in Year One**

**A. The DA should visit every police department in Bucks County**

During his first year, the DA should make it a priority to visit every police department across the County and foster the relationships necessary to continue the strong bond between the District Attorney's Office and community law enforcement.

**B. The DA should visit each school district in Bucks County**

Similarly, the DA should try to visit schools in every Bucks County school district during his first year. Ensuring strong ties with school communities will ensure continued collaboration and communication between the DA, the Office, and schools. The DA should also introduce teachers, administrators, and school resource officers to the SIU prosecutor assigned to handle cases involving allegations against school employees.

**C. Shine a light on the immigrant communities of Bucks County**

While Bucks County is the home of many vibrant and diverse immigrant communities, immigrants have been recently demonized by national leaders. As the son of a Pakistani immigrant and Pennsylvania's first Asian American row officer, the DA can and should leverage his public profile to help spotlight the diverse immigrant communities who have contributed so much to making Bucks the best county in which to live, work and raise a family. Notably, while law enforcement officials across Bucks County have worked hard to build trust with the community,

recent actions by ICE have caused reputational damage to law enforcement across the country. Given the key role that immigrants play in helping report crime, the DA should do everything he can to make all Bucks Countians feel safe calling 911 and going to court. To the extent possible, the DA should leverage his position as a career prosecutor and first generation American to ensure strong ties between the police and immigrant communities who rely on law enforcement to keep them safe.

### 3. Modernize the Office's social media outreach

#### **A. Map out a social media plan to create reliable community outreach**

Publishing certain posts about certain themes or topics (e.g. law enforcement, children, etc.) on a predictable schedule will help the community receive information about the mission, goals, and accomplishments of the Office as well as community partners. The Office should transition away from the tradition of focusing on offenders (and their mug shots) and towards a model that honors victims, uplifts allies and partners, and highlights the accomplishments of the Office's employees.

#### **B. Stop trusting AI to moderate online commentary**

Although the Office's uses social media platforms with published standards for screening offensive, harmful and obscene content, these standards are not enforced with consistency or regularity. As a result, hate speech, misinformation and otherwise offensive conduct frequently dominate posts that are intended to inform, uplift, or otherwise engage constituents. The pre-existing system of relying on artificial intelligence to moderate comments is not only inadequate but presents concerns about both censorship and the validation of misinformation. Until companies like Meta provide a method for allowing comments that can ensure that viewers are not exposed to hateful, obscene and otherwise offensive content on the Office's platform, comments should either be moderated by a human or, following the example of New Jersey prosecutors, turned off completely.

#### **C. Revisit social media policies and strategies on a regular basis**

The Communications staff should monitor engagement to see how successful the Office's strategies are and how these strategies can be improved. On at least an annual basis, the Office should revisit its social media policies to ensure that they

align with best practices as well as changes in the functionality and usage of the social media platforms.

#### 4. Engage the public in new ways

##### **A. Become a thought leader on justice and public safety issues**

The DA and senior staff should look for opportunities to raise consciousness and influence thinking on criminal justice, public protection and other legal issues through op-eds, guest essays, or long form posts on platforms such as Substack. Providing testimony at hearings held by government bodies and legislators can also bring public attention to these issues while directly influencing reform.

##### **B. Grant long-form interviews regarding the Office's work**

While the media will frequently cover the Office's arrests and prosecutions, the DA and senior staff should agree to sit for longer interviews to promote the work of the Office, particularly when there is a focus on cases or functions which are new. In the modern-day media landscape, such interviews may be done on podcasts, YouTube channels, or other alternatives to traditional radio and television.

##### **C. Engage community groups who are new to interacting with the Office**

While the District Attorney Office has strong relationships with many community groups, much more can be done. Spreading awareness of the office's mission, its resources, and its people will keep the community engaged in this work and position the Office to understand the needs of the community and what untapped resources may be available to help. For example, strong relationships with the business community can be invaluable for enriching and expanding the Office's diversionary and re-entry offerings.

## Conclusion

This document is a reflection of the strength of our community and the willingness of many to foster the growth of a true law office for the people. We hope that in the years to come, the report may serve as a roadmap to help the Bucks County District Attorney's Office realize its fullest potential to deliver justice for all. Thus, to the preceding 48 recommendations, we add two about the Transition Report itself.

First, to model transparency, we recommend that the District Attorney publish the report on or before his 180<sup>th</sup> day in office.

Second, to promote accountability, we recommend that the Office publish a progress report no later than one year later.

We live in challenging times, when people have lost faith in government at all levels. District Attorneys, particularly in Pennsylvania, are uniquely situated to rise above politics and take action to make peoples' lives better. With the right team and the right plan, DA Khan can help restore that faith by showing Bucks County and all of Pennsylvania what a law office of the people can do to serve justice for all.