



**U.S. Department of Justice**  
Drug Enforcement Administration

*Office of the Administrator*

*Springfield, VA 22152*

March 24, 2023

The Drug Enforcement Administration received the “Report on the Drug Enforcement Administration Foreign Operations Review,” which contains findings and recommendations to assess our foreign operations, enhance our integrity efforts, and maximize the impact of our global work. DEA requested the comprehensive review in August 2021 to evaluate the strengths and weaknesses in our foreign operations. The independent review team was led by Jack Lawn, a former DEA Administrator from 1985 to 1990, and Boyd Johnson, a partner at WilmerHale, who previously served as an Assistant United States Attorney and the Deputy United States Attorney in the Southern District of New York, where he led the International Narcotics Trafficking Unit and Public Corruption Unit. This review is the first of its kind in DEA’s 50-year history.

DEA accepts all of the independent review team’s recommendations and will immediately begin the process of implementing them.

The report outlined 17 total recommendations to enhance DEA’s effectiveness and integrity overseas. The independent review team recommends that DEA continue to move toward a “One DEA” model to ensure foreign operations consistently prioritize current U.S. drug threats; DEA enhance integrity and compliance efforts in its foreign operations and assign additional resources and conduct oversight based on a particular country’s risks; and, DEA regularly assess its foreign footprint to enhance integrity and maximize impact against current U.S. drug threats.

Over the past year, DEA has made a number of changes consistent with the independent review team’s recommendations. DEA has made a “One DEA” approach our priority—sharing information and improving coordination across the agency to adapt to the rapidly evolving drug threats facing our nation. DEA has identified the Sinaloa and Jalisco Cartels as the primary global threats against the United States today and created Counter Threat Teams targeting these two cartels, so that all of DEA can work relentlessly to defeat them. DEA is building new technology to support our mission in all 334 offices worldwide. DEA has also updated our hiring policies, heightened our disciplinary standards, and established metrics to inform performance evaluations and improve the accountability of our workforce. DEA is committed to ensuring that all DEA employees are held to the highest standards of conduct.

DEA appreciates the thoughtful work of the independent review team, which built on the efforts of the Department of Justice’s Office of the Inspector General. DEA looks forward to leveraging the independent review team’s recommendations to meet the challenges presented by today’s drug threats. DEA’s mission to protect the safety and health of the American people demands a global presence and effective foreign operations. DEA is committed to working with the utmost integrity here and abroad.

A handwritten signature in black ink, appearing to read "Anne Milgram", with a large, stylized flourish extending to the right.

Anne Milgram  
Administrator

# **Report on the Drug Enforcement Administration Foreign Operations Review**

**Jack Lawn and Boyd Johnson**

## I. INTRODUCTION

### A. Overview

Over the past 50 years, the United States Drug Enforcement Administration's (DEA) foreign operations have provided critical support to the agency's mission of enforcing the US controlled substances laws and protecting the health and safety of American communities. The DEA's foreign presence has contributed to successful operations to disrupt and dismantle transnational organized crime networks and to arrest and extradite key drug cartel leaders back to the United States for prosecution. In addition to advancing the US-focused mission of the agency, the DEA's foreign country offices have contributed important information and operational support to a variety of other US government agencies.

The DEA's global presence also has allowed the agency to provide on-the-ground training, resources, and mentoring to foreign law enforcement organizations. These capacity-building efforts have played an important role in promoting the rule of law by allowing host nations to better enforce their own drug laws thereby enhancing the DEA's worldwide impact. At the same time, the drug threats facing US communities and the transnational organized crime networks behind them are rapidly evolving. Where past threats were tied to drugs with growing seasons in specific geographies, the new threats facing US communities come from largely synthetic drugs, like fentanyl, which the DEA Administrator has recently called the "single deadliest drug threat our nation has ever encountered."<sup>1</sup> Fentanyl is easier and cheaper to manufacture than previous drug threats like heroin. And the precursor chemicals used to make fentanyl are harder to track because they have multiple uses, some of which are legal, and are manufactured, stored, and smuggled from overseas. This new threat reinforces the importance of ensuring DEA's operations remain nimble and flexible in response to the dangers posed by synthetic drugs, their precursor chemicals, and the transnational organized crime networks that traffic them from overseas.

While the DEA's foreign operations have played a crucial role in the agency's overall success, there are several areas where improvements could be made to maximize effectiveness, including with respect to compliance efforts.<sup>2</sup> Because transnational organized crime networks thrive in countries with governmental corruption and weak law enforcement capacity, the DEA must operate in high-risk environments posing unique compliance challenges. Over the past decade, there have been critical incidents in Mexico, Honduras, Colombia, and Haiti involving DEA-

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<sup>1</sup> DEA, *Fentanyl Awareness*, <https://www.dea.gov/fentanylawareness> (last accessed Jan. 22, 2023).

<sup>2</sup> While the DEA has an Office of Compliance that is responsible for identifying and implementing measures to mitigate enterprise-level risks, when this report refers to "compliance" it encompasses all DEA component offices with risk management responsibilities such as DEA's Inspection Division (which is responsible for DEA's audit functions and houses DEA's Office of Professional Responsibility which investigates allegations of misconduct involving DEA employees).

supported foreign law enforcement units, including incidents which involved civilian deaths, corruption, and compromised intelligence.<sup>3</sup> There have also been several recent instances of individual misconduct by DEA personnel assigned to DEA's foreign offices. Past misconduct and critical incidents highlight the uniquely difficult circumstances under which the DEA operates overseas and underscore the need for risk-based compliance and accountability processes to allow the agency to successfully carry out its mission while minimizing the risk of critical incidents or other compliance issues.

In a demonstration of the DEA's commitment to improving its operational effectiveness and compliance efforts across its foreign operations, on August 26, 2021, Administrator Anne Milgram announced a comprehensive review of the DEA's foreign operations to be overseen by an outside expert review team (the "Review Team"). On October 26, 2021, Administrator Milgram identified former DEA Administrator Jack Lawn and Boyd Johnson, a former federal prosecutor, as the leaders of the Review Team. Administrator Milgram noted that the objective of the review was to assess the DEA's current international capacity and identify areas for improvement to ensure the DEA's foreign operations have the maximum impact while ensuring compliance with applicable laws, rules, and regulations. This report and its findings and recommendations are the result of the Review Team's work.

## **B. Review Team Biographies**

### *Former DEA Administrator Jack Lawn*

John C. "Jack" Lawn served as DEA Administrator from 1985 to 1990. He previously served as Deputy Administrator from 1982 to 1985, at which time he was designated Acting Administrator. At the time of his federal retirement, Mr. Lawn was honored at a White House ceremony where President George H.W. Bush presented him with The President's Medal, our nation's highest honor for Distinguished Federal Civilian Service.

Before coming to the DEA, Mr. Lawn was a Special Agent for the Federal Bureau of Investigation (FBI) for fifteen years. As Special Agent in Charge of the FBI's San Antonio field office from 1980 to 1982, he directed the successful investigation into the assassination of US District Judge John H. Wood, Jr. Before this historic case, Mr. Lawn supervised all FBI civil rights cases, including allegations of police brutality and color of law complaints. In addition, he was responsible for background investigations of White House officials, federal judges, and US Attorney nominees. He also served in the Criminal Division of FBI headquarters where he

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<sup>3</sup> See, e.g., US DEP'T OF JUST. OFF. OF THE INSPECTOR GEN., 21-109, AUDIT OF THE DRUG ENFORCEMENT ADMINISTRATION'S HEADQUARTERS-BASED OVERSIGHT OF ITS SUPPORTED FOREIGN LAW ENFORCEMENT UNITS (2021).

supervised the US House Select Committee on Assassinations reviews of the assassinations of John F. Kennedy and Martin Luther King, Jr.

From 1990 to 1994, Mr. Lawn was vice president and chief of operations for the New York Yankees. In 2010, in recognition of his decades of leadership and commitment to drug law enforcement, drug abuse prevention, and drug treatment, the DEA Educational Foundation honored Mr. Lawn with the DEA Educational Foundation Lifetime Achievement Award.

*Former Federal Prosecutor Boyd Johnson*

Over the past three decades, Mr. Johnson has served in a variety of senior roles, including as the general counsel for an international investment firm; the co-chair of WilmerHale's White Collar Defense and Investigations Practice; and the Deputy US Attorney for the Southern District of New York. *Chambers USA*, *Best Lawyers in America*, and *The Legal 500* have consistently recognized Mr. Johnson as one of the nation's leading lawyers.

Earlier in his career, Mr. Johnson served for more than a decade as an Assistant US Attorney in the Southern District of New York, handling hundreds of federal criminal matters before the Southern District bench. Most notably for the current project, Mr. Johnson co-founded and led the Southern District's International Narcotics Trafficking Unit, working closely with the DEA to gather evidence in more than 20 countries to support extraditions of drug kingpins, narco-terrorists, and global money launderers back to the US. Mr. Johnson personally supervised or handled prosecutions impacting each of the DEA's current global regions, including Mexico, Colombia, Central America, the Caribbean, Afghanistan, and China. His experience working with DEA's international offices provides Mr. Johnson with a unique understanding of the benefits and challenges of DEA's relationships with foreign counterparts. Mr. Johnson later served as the Chief of the Southern District's Public Corruption Unit, investigating local, state, national and international corruption involving elected and appointed officials. Finally, as the Deputy US Attorney, Mr. Johnson oversaw the litigation of all criminal and civil cases brought on behalf of the US in the Southern District of New York, supervising over 200 Assistant US Attorneys and working closely with law enforcement agencies, including the DEA. He has carried that experience to WilmerHale, where he has worked on numerous cross-border reviews, including global schemes involving corruption, money laundering, and fraud.

## II. METHODOLOGY

### A. Objectives

The review team's objectives were: (1) to review the DEA's foreign operations to assess effectiveness, strengths, and areas of improvement for furthering DEA's mission, core values, and compliance with applicable laws, rules, and regulations; and (2) to develop strategic and actionable recommendations for improvements to DEA's foreign operations to maximize effectiveness and to ensure compliance.

### B. Overview of Work

To carry out its work, the Review Team analyzed documents and interviewed personnel from DEA's component offices, including the agency's Foreign Regions, Domestic Divisions, and Headquarters-based divisions, including the Special Operations Division (SOD). The Review Team also conducted site visits to the DEA's offices in Bogota, Colombia, and Santo Domingo, Dominican Republic, as well as site visits to various US-based teams supporting the work of the Foreign Regions. In addition, the Review Team analyzed reports issued by other US government entities, including the Department of Justice's Office of the Inspector General (DOJ OIG), the US Office of Special Counsel (OSC), and Congress.

Over the past year, the Review Team took the following steps to reach the findings and recommendations contained in this report:

- Reviewed and analyzed key materials from the DEA, including internal agency policies and procedures, personnel manuals, training materials, internal agency assessments and analyses, including inspections reports and the Threat Enforcement Planning Process, as well as reports from the DOJ OIG and the OSC. More specifically, the written materials considered by the Review Team included materials from the following DEA components and US government agencies:
  - DEA Foreign Regions
  - DEA Domestic Divisions
  - DEA Headquarters, including:
    - Office of Administrator
    - Office of Compliance
    - Office of Chief Counsel

- Inspection Division
  - Intelligence Division
  - Operations Division
  - SOD
- US Department of Justice (DOJ)
- US Department of State, including Bureau of International Narcotics and Law Enforcement Affairs (INL)
- US Department of Defense (DOD)
- US Intelligence Community (IC)
- Spoke with more than 100 individuals, including interviews with more than 67 DEA officials and eight representatives from the DOJ, DOD, INL, and the IC, as well as meetings with various DEA supervisors and personnel stationed in DEA's Headquarters and various foreign offices.
- Consulted with approximately 25 former DEA agents and former federal law enforcement officials to inform the review team's work.
- Categories of DEA officials the Review Team interviewed included, among others:
  - DEA Administrator, Principal Deputy Administrator, Chief of Operations
  - Division leaders at Headquarters
  - Executive Staff
  - Regional Directors
  - Enforcement Group Supervisors
  - Intelligence Group Supervisors
  - Technical Operations Groups Staff
  - Administration Group Staff
  - Members of DEA Headquarters Operations Division

- Members of DEA Intelligence Divisions
- Members of DEA SOD
- Visited the DEA's offices in Bogota, Colombia, and Santo Domingo, Dominican Republic, to interview officials on the ground, including DEA officials, other US government agency officials, and foreign law enforcement counterparts.
- Visited the DEA's new Counter Threat Teams' offices.

The DEA provided the review team with complete and unfettered access to the requested information, documents, and employees. In addition, DEA leadership allocated the time of senior staff members to help facilitate the Review Team's work, and provided logistical support for meetings at DEA Headquarters, Bogota Country Office, Dominican Republic Country Office, and other locations.



### III. BACKGROUND

This section provides an overview of the DEA's mission and core values, as well as information on how the DEA's foreign operations contribute to that mission. More specifically, this section describes the structure of the DEA's international offices and three key programs leveraged by the DEA to pursue its mission: (1) Sensitive Investigative Units (SIUs), (2) Vetted Units (VUs), and (3) Judicial Wire Intercept Programs (JWIPs). This section also discusses Attorney General Exempt Operations (AGEOs), which play a role in the DEA's ability to conduct sensitive, undercover investigations in the United States. Finally, this section addresses recent incidents that have implicated DEA's operations abroad, recent DEA international enforcement successes, and current DEA initiatives intended to improve DEA's foreign operations.

#### A. DEA's Mission and Core Values

The DEA's mission is to enforce US controlled substances laws and bring to justice, whether domestically or overseas, transnational organized crime networks involved in the growing, manufacture, or distribution of controlled substances appearing in or destined for illicit traffic in the United States. The DEA is also charged with recommending and supporting non-enforcement programs aimed at reducing the availability of illicit controlled substances on the domestic and international markets.<sup>4</sup>

In pursuit of this mission, DEA's current leadership has aligned its operations and programming to prioritize disrupting and dismantling the transnational organized crime networks responsible for drug-related violence and fentanyl and methamphetamine overdose deaths in the US in order to protect the health and safety of American communities.<sup>5</sup> As discussed below, this alignment has led the DEA to place particular focus on certain drug cartels based in Mexico.

To guide the execution of its mission, the DEA has identified eight core values:

- **Rule of Law:** Dedication to upholding the Constitution of the United States and the rule of law.
- **Respect and Compassion:** Respect and compassion for those they protect and serve.
- **Service:** Faithful and effective service to the country and its citizens.

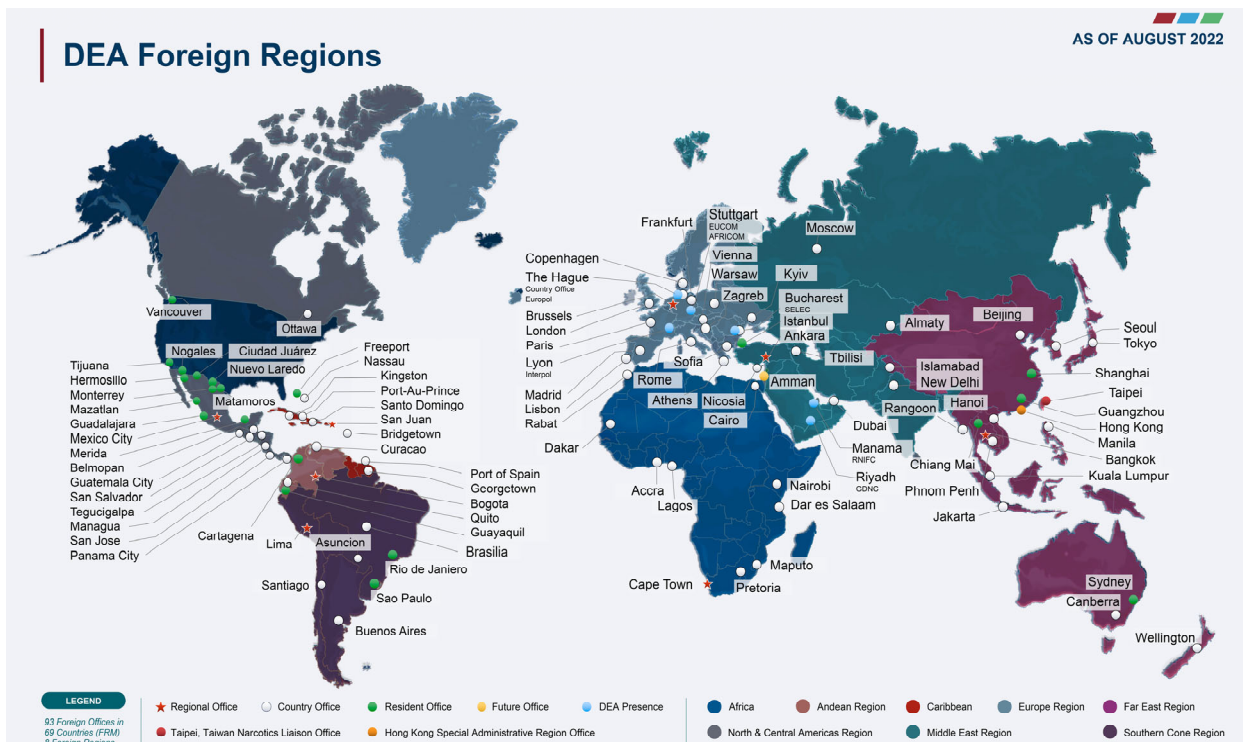
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<sup>4</sup> DEA, MISSION, <https://www.dea.gov/about/mission>.

<sup>5</sup> See, e.g., DEA, ADMINISTRATOR ANNE MILGRAM REMARKS ON THE OVERDOSE EPIDEMIC AS PRESENTED AT THE OFFICE OF NATIONAL DRUG CONTROL POLICY PRESS CALL (Nov. 17, 2021), <https://www.dea.gov/press-releases/2021/11/17/administrator-anne-milgram-remarks-overdose-epidemic>; DOJ, DEPARTMENT OF JUSTICE ANNOUNCES DEA SEIZURES OF HISTORIC AMOUNTS OF DEADLY FENTANYL-LACED FAKE PILLS IN PUBLIC SAFETY SURGE TO PROTECT U.S. COMMUNITIES (Sep. 30, 2021), <https://www.justice.gov/opa/pr/departments-justice-announces-dea-seizures-historic-amounts-deadly-fentanyl-laced-fake-pills>.

- **Devotion:** Devotion to its core mission of enforcing the nation’s controlled substance laws and enhancing public health, safety, and national security.
- **Integrity:** Uncompromising personal, professional, and institutional integrity.
- **Accountability:** Accountability to the agency and those it serves.
- **Leadership and Courage:** Leadership and courage in the profession, communities, and lives.
- **Diversity:** Commitment to diversity and excellence.<sup>6</sup>

## B. DEA’s Foreign Operations



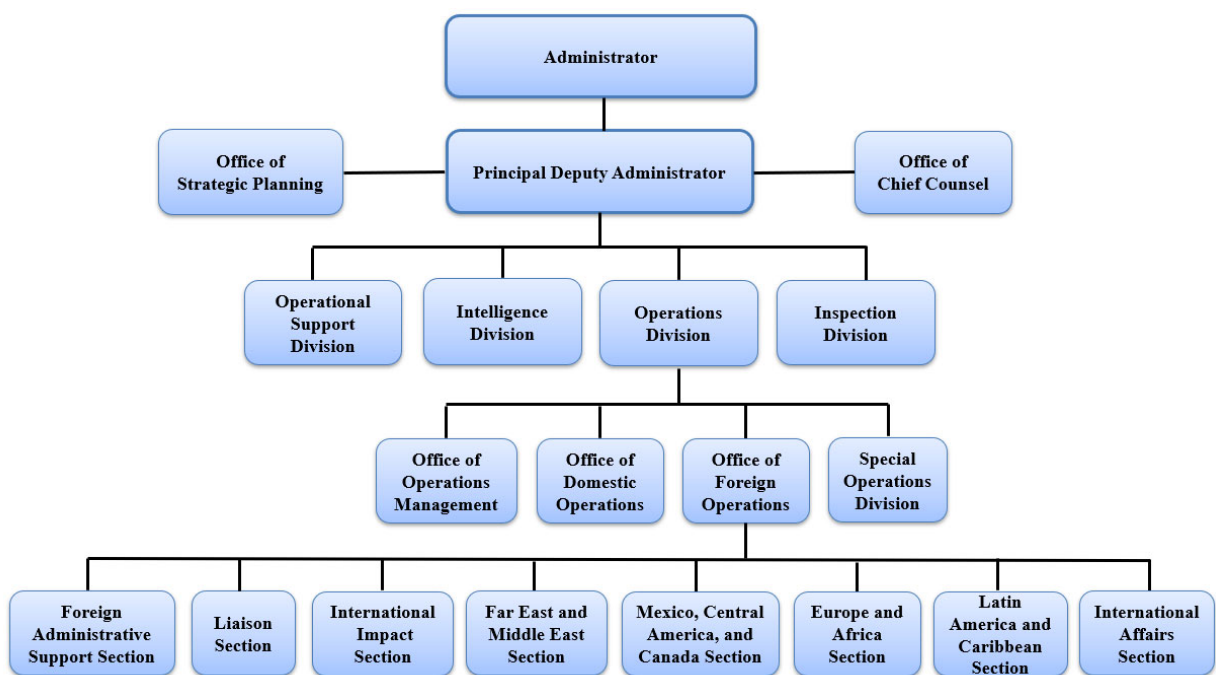
The DEA’s foreign operations are essential to the agency’s ability to respond to global threats. These threats include international drug cartels facilitating the worldwide distribution of fentanyl, methamphetamine, and other dangerous drugs and essential precursor chemicals threatening the health and safety of the American public. In its current structure, the DEA has 93 foreign offices in 69 countries, organized into eight “Foreign Regions,” led by “Regional

<sup>6</sup> DEA, WHO WE ARE, <https://www.dea.gov/who-we-are/>.

Directors’’: Africa, Andean, Caribbean, Europe, Far East, Middle East, North and Central America, and Southern Cone.<sup>7</sup>

Working closely with foreign counterparts, the DEA’s international operations help to diminish the flow of fentanyl, methamphetamine, and other dangerous drugs into the US and to disrupt and dismantle the transnational organized crime networks that pose the greatest threat to the health and safety of US communities. DEA also provides training to foreign counterparts, enabling host nations to increase their experience and expertise with drug investigations and promoting the rule of law overseas.

**C. DEA Foreign Division Organizational Structure**



DEA’s Foreign Operations consist of several component offices that contribute to the overall mission. DEA Headquarters provides programmatic oversight and support to the foreign operations, including through compliance oversight, funding support, and procedural and logistical guidance.

<sup>7</sup> While the DEA currently refers to Foreign Regions, we recommend that the name be changed to “Foreign Divisions” to align with the terminology of Domestic Divisions and to further promote the “One DEA” approach discussed throughout this report. This change in terminology also would remove any administrative distinction between how leaders of Domestic Divisions (called “Special Agents in Charge” (SACs)) and leaders of Foreign Regions (historically called “Regional Directors” (RDs)) operate. It is our understanding that DEA leadership is in the process of making this change. As a result, we use the term “Foreign Divisions” rather than “Foreign Regions” throughout the balance of this report.

In addition, the DEA Headquarters works closely with the Foreign Divisions and assists in the coordination and operational execution of multi-jurisdiction, multi-nation, and multi-agency investigations of transnational organized crime networks across DEA's global footprint. DEA Headquarters coordinates with partners from other US law enforcement agencies.

Finally, the new Counter Threat Teams help DEA's foreign offices with enforcement and targeting support. The work of these new teams is discussed further below.

In addition to the DEA's country offices, there are several DEA Headquarters offices and sections that provide administrative support and oversight to the Foreign Divisions. The following provides an overview of each component office and section and a brief description of their functions as they were organized at the time of review. The Review Team encourages DEA leadership to consider reorganizing more offices and sections as it continues to accelerate towards a "One DEA" approach:

- **Office of Foreign Operations (OF):** Oversees operational and enforcement matters involving DEA's country offices and foreign law enforcement partners.
- **International Affairs Section (OFI):** Serves as the central collection and advisory elements for all Operations Division and Intelligence Division products developed for the purpose of meeting with foreign dignitaries, US ambassadors, and military personnel.
- **Europe & Africa Section (OFE):** Provides operational support and expertise to sixteen DEA country offices and three interagency coordination centers, and two DoD Combatant Commands across Europe and ten DEA offices across Africa. OFE's portfolio includes overseeing strategic interactions involving Headquarters, the Europe and Africa Divisions, and their host nation counterparts.
- **Mexico, Central America, and Canada Section (OFM):** Acts as a liaison for information sharing and support between the North and Central Americas Divisions and Headquarters divisions and sections. OFM's areas of responsibility include the eleven DEA offices in Mexico, seven DEA offices in Central America, and two DEA offices in Canada, including reviewing daily enforcement reporting (SEAR) impacting OFM's area of responsibility and identifying significant events/trends for reporting, coordination, or follow-up.
- **Latin America & Caribbean Section (OFL):** Provides operational support and expertise to nine DEA offices across the Caribbean and eleven DEA offices throughout South America. OFL's portfolio includes overseeing strategic interactions involving Headquarters, the Caribbean Division, the Andean and Southern Cone Regions, and their host nation counterparts.

- **Far East & Middle East Section (OFA):** Provides operational coordination responsibilities for the eighteen DEA offices in the Far East Division and the nine offices, one coordination center, and one capacity building project in the Middle East Division. In coordination with SOD and other sections, OFA provides support for DEA investigations and operations while ensuring compliance with DEA's goals and objectives and the laws of the United States and host countries.
- **International Impact Section (OFP):** Provides oversight and direction to Country Offices engaged in the expenditures of Operation All-Inclusive funds. OFP disburses that funding to country offices on a quarterly basis for the purpose of supporting interdiction operations. OFP is also responsible for the oversight of the SIU, VU, and JWIP programs. OFP conducts onsite SIU and VU program compliance reviews during Inspection Division off-years to ensure that these programs are reviewed more frequently and to provide Headquarters more oversight into these programs.
- **Liaison Section (OFD):** Provides law enforcement expertise, procedural guidance, and insight to policy decision makers regarding the development of domestic, international, and interagency programs. Prior to October 1, 2022, the Office of Foreign Operations had oversight of liaison officers at AFRICOM, CENTCOM, EUCOM, NORTHCOM, SOCOM, SOUTHCOM, JIATF-S, JIATF-W, CIA, INTERPOL (Lyon), INTERPOL National Central Bureau (NCB) Washington, D.C., and INL. Since October 1, 2022, the Office of Foreign Operations moved responsibility for the DEA liaison officers to SOD, except for AFRICOM, EUCOM, CIA, INTERPOL (Lyon), NCB, and INL. The Office of Foreign Operations retained responsibility for the liaison officers at AFRICOM and EUCOM based overseas.
- **Foreign Administrative Support Section (OFS):** Oversees DEA's foreign administrative and personnel programs and policies. OFS administratively manages all DEA country offices with respect to personnel matters while coordinating other support requirements with appropriate Headquarters elements.
  - **Foreign Personnel Support Unit A (OFSP-A):** Provides expert guidance, advice, and assistance to employees and family members during the Permanent Change of Station (PCS) process.
  - **Foreign Personnel Support Unit B (OFSP-B):** Manages the Foreign Training Program and the coordination of other required training for employees completing the PCS process.

- **Logistical Unit (LFSM):** Provides technical, logistical, and some administrative services to the DEA country offices.

#### **D. Foreign Operations Programs involving Foreign Counterparts**

The Office of Foreign Operations, through the International Impact Section, oversees three programs involving partnerships with foreign law enforcement counterparts: (1) SIUs, (2) VUs, and (3) JWIPs. DEA vets, trains, and partners with SIUs and VUs that are specialized units within a host nation's law enforcement and/or military agencies capable of initiating and bringing to completion complex drug investigations in order to target, disrupt, dismantle, and prosecute major international drug trafficking organizations impacting the United States. DEA's JWIPs support judicially authorized wire intercepts of communications devices to support the investigation and legal prosecution of transnational organized crime networks.

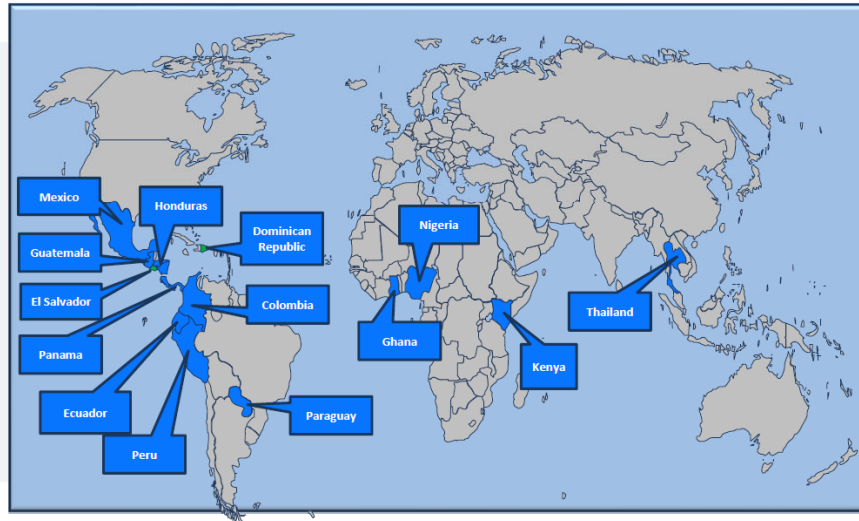
The use and management of SIUs and VUs varies from country to country. The DEA provides financial support for the SIU's activities, which are usually managed on a day-to-day basis by a senior host nation law enforcement officer with DEA special agents providing guidance and assistance. In contrast, VUs do not have a recurring DEA budget and are typically funded by other US government agencies, such as DOD or INL. SIUs and VUs perform important functions in support of DEA's mission, such as conducting investigative operations, surveillance, and judicially authorized electronic intercepts; directing investigative leads; destroying drug production laboratories; and interdicting drug shipments. The DEA considers the SIUs and VUs to be valuable operational enforcement partners and force multipliers, although these relationships create compliance challenges due to the high-risk nature of many jurisdictions where the DEA operates.

Similar to US-based investigations that use Title III wiretaps to gather evidence that can be used in US Courts, the DEA currently supports JWIPs in numerous countries in accordance with host nation laws that permit wire intercepts of communication devices pursuant to judicial process (such as a court order) in that country. The DEA uses JWIPs to help identify and gather critical evidence against transnational organized crime networks that threaten US interests and support enforcement or prosecutions by the host nations. JWIPs collect call detail records including landline and mobile phone calls as well as text messaging and other activity on various communications applications.

The following section describes key elements of these foreign counterpart-related programs.

## 1. SIUs

### SIU Global Presence



According to DEA’s Agents Manual (AM), the SIU program is an “elite international investigative program[] that support[s] efforts to combat the cultivation, production, trafficking of narcotics, the diversion of precursor chemicals, and money laundering.”<sup>8</sup>

SIUs are comprised of host law nation enforcement and/or military personnel working with the guidance and support of DEA country offices that previously served as VUs. If a VU demonstrates success and is deemed ready to be elevated to the status of an SIU, the International Impact Section conducts an assessment that includes an analysis of the level of investigations conducted by the unit and the impact on US interests, effectiveness of the partnership, and commitment to anti-narcotic efforts, among other criteria. If the criteria are met, the Office of Foreign Operations then concurs and grants approval and a DEA budget is requested and prepared.

DEA describes the mission of the SIU program to be to:

[T]rain, equip, and support specialized units within [host nation’s] law enforcement/military agencies capable of initiating and bringing to completion complex drug investigations involving the cooperative development and sharing of intelligence in order to target, disrupt, dismantle and prosecute major

<sup>8</sup> DEA AM § 6541.1(B).

international [drug trafficking organizations] impacting the [United States]. SIUs assist in the development and support of [US] priorities within their countries and the respective regions where they reside and operate.<sup>9</sup>

DEA provides more training to SIUs than to VUs.<sup>10</sup> DEA provides SIU members with approximately five weeks of basic training offered by the DEA Training Academy in Quantico, Virginia.<sup>11</sup> One interviewee suggested that training in Quantico for foreign counterparts is “critical” and further builds relationships between DEA agents and foreign law enforcement officers that can “last forever.”<sup>12</sup> The DEA routinely evaluates training courses and modifies them to address existing and emerging threat situations.<sup>13</sup> The basic training program prepares foreign law enforcement officers to engage in all aspects of international operations, including JWIPs.

Beyond the initial five-week basic training curriculum, the DEA also provides advanced training seminars for SIU members in their respective countries or at the DEA Training Academy.<sup>14</sup> On average, between 30 and 40 SIU members will attend each two-week advanced training seminar.<sup>15</sup> DEA expects that approximately 80 SIU members will participate in the two advanced training seminars anticipated to be held annually in future years. In addition, the DEA provides specialized training in foreign locations tailored to meet the specific needs of a particular SIU (i.e., clandestine laboratory training for SIUs located in cultivation regions).<sup>16</sup>

Lastly, DEA provides select SIU members with training offered and funded by INL’s International Law Enforcement Academies (ILEA).<sup>17</sup> The DEA believes that the training provided through INL’s five ILEAs has effectively expanded the skills of host nation law enforcement.<sup>18</sup>

Upon entry into a SIU, and at periodic intervals, the DEA requests that selected foreign law enforcement personnel candidates undergo vetting. This includes a background check before becoming an SIU member, annual urinalysis tests, annual “Leahy Vetting” checks, and a

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<sup>9</sup> DEA AM § 6541.1(E).

<sup>10</sup> DEA AM § 6541.

<sup>11</sup> *Id.*

<sup>12</sup> Interview with Andean Region Executive Staff.

<sup>13</sup> DEA AM § 6541.

<sup>14</sup> *Id.*

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

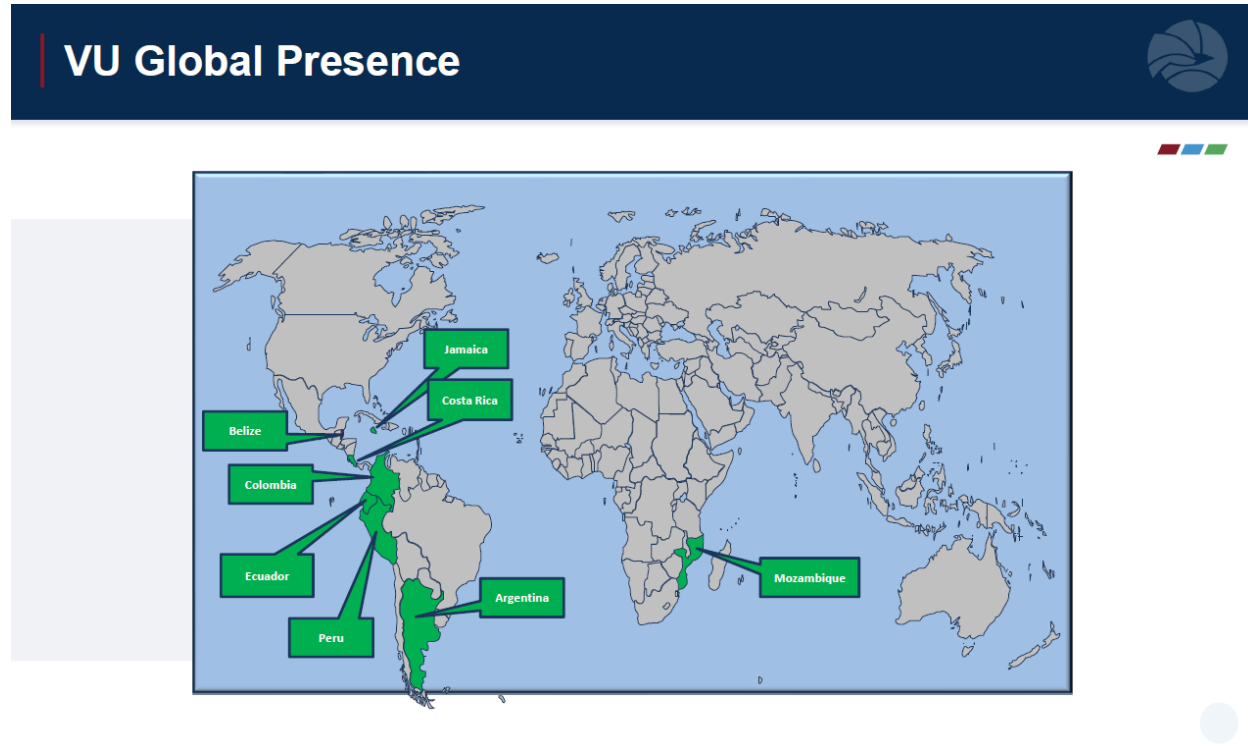
<sup>18</sup> *Id.*



polygraph examination every three years.<sup>19</sup> The vetting process is designed to mitigate the risk of possible corruption of SIU members and to limit the potential for the compromise of investigative information.

In response to the DOJ OIG’s findings regarding the DEA’s Foreign Operations, including concerns raised about the management and oversight of SIUs, the DEA has recently implemented new policies and protocols to ensure the mandatory reporting and tracking of critical incidents involving SIUs. The DEA has also assigned specific roles within Headquarters to designate responsibility for tracking and assessing SIU critical incidents to identify possible systemic issues that require additional oversight and programmatic changes. In addition, the DEA has developed new systems and SIU-specific metrics to allow SIU program managers to monitor in real time outcomes and performance associated with each SIU.

## 2. VUs



<sup>19</sup> The “Leahy Laws” prohibit US assistance to foreign security force units when there is credible information that the unit has committed a “gross violation of human rights.” See 22 U.S.C. §2378d and 10 U.S.C. §362. Pursuant to the laws, before providing relevant assistance, the US government must screen potential recipients for information about involvement in gross violations of human rights. See also CONG. RSCH. SERV., F10575, GLOBAL HUMAN RIGHTS: SECURITY FORCES VETTING (“LEAHY LAWS”) (Aug. 5, 2022), [https://crsreports.congress.gov/product/pdf/IF/IF10575#:~:text=The%20%E2%80%9CLEahy%20Laws%E2%80%9D%20prohibit%20U.S.,human%20rights%E2%80%9D%20\(GVHR\).](https://crsreports.congress.gov/product/pdf/IF/IF10575#:~:text=The%20%E2%80%9CLEahy%20Laws%E2%80%9D%20prohibit%20U.S.,human%20rights%E2%80%9D%20(GVHR).)

The DEA established the VU program to create additional, well-trained foreign counterpart drug and money laundering investigative and intelligence units to target, disrupt, dismantle, and ultimately prosecute transnational organized crime networks.<sup>20</sup> VUs are comprised of host nation enforcement and/or military personnel working with the guidance and support of DEA country offices and oversight from Headquarters. DEA describes the mission of the VU program to be to:

[F]orm well-trained foreign counterpart drug investigative and drug intelligence units of high moral character and integrity to target, disrupt, dismantle, and prosecute major international drug trafficking organizations . . . impacting the United States . . . , the region, and the [host nation]; and to develop partner nation capacity in order to effectively share drug intelligence relevant to significant transnational criminal organizations.<sup>21</sup>

DEA country offices must first conduct a comprehensive need and viability assessment evaluating the following factors prior to seeking to establish a VU, which includes an analysis of:<sup>22</sup>

- Trafficking trends and activity in the host nation, and how such trends and activities impact the US;
- The host nation's laws and legal system;
- The DEA country office's capacity to support a VU; and
- The host nation's interest and ability to support a VU.

If there is sufficient need based on the DEA country office's assessment, and the host nation demonstrates interest and has the capacity to support a VU, then the DEA seeks certain interagency and internal approvals. These approvals include:

- Concurrence of the Department of State Chief of Mission in the relevant US Embassy;<sup>23</sup>
- Concurrence from INL and/or the DOD for funding;<sup>24</sup> and

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<sup>20</sup> See US DEP'T OF JUST. OFF. OF THE INSPECTOR GEN., 21-109, AUDIT OF THE DRUG ENFORCEMENT ADMINISTRATION'S HEADQUARTERS-BASED OVERSIGHT OF ITS SUPPORTED FOREIGN LAW ENFORCEMENT UNITS (2021).

<sup>21</sup> DEA AM § 6541.1(D).

<sup>22</sup> DEA AM § 6541.3(A)(1).

<sup>23</sup> DEA AM § 6541.3(A)(2).

<sup>24</sup> *Id.*

- Confirmation from Department of State that the relevant US Embassy personnel are available and committed to funding and support needed to sustain a VU for a minimum of three years.<sup>25</sup>

The VUs do not have a recurring DEA budget and are typically funded by other US government agencies, such as DOD or INL. Members of the VUs attend a two-week VU basic training course in-country led by the DEA tailored to the type of unit and skills required.<sup>26</sup>

Upon entry into a DEA VU, and at periodic intervals, the DEA requests foreign law enforcement personnel candidates to pass a background check, a polygraph examination<sup>27</sup>, a urinalysis test, and “Leahy vetting.” The vetting process is designed to mitigate the risk of possible corruption of VU members and to limit the potential for the compromise of investigative information.

### 3. JWIPs

The DEA currently supports JWIPs in numerous countries in accordance with host nation laws that permit the use of these judicially-authorized programs.<sup>28</sup> JWIPs collect foreign telecommunications data intercepts, including landline and mobile phone calls, as well as text messaging and other communication applications, to support the investigation and legal prosecution of transnational organized crime networks.<sup>29</sup> In SIU countries where there is a JWIP, SIU members typically monitor the intercepts.<sup>30</sup>

JWIPs are established and operated in accordance with host nation laws pursuant to judicial process (e.g., court orders). In coordination with vetted host nation partners and pursuant to the host nation’s judicial process, the DEA leverages JWIPs as an investigative tool to collect evidence and identify transnational organized crime networks and their direct connections to criminal activity within the United States and otherwise affecting US interests to support legal prosecution of potential crimes.<sup>31</sup> JWIPs allow the DEA and its host nation counterparts to

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<sup>25</sup> *Id.*

<sup>26</sup> See US DEP’T OF JUST. OFF. OF THE INSPECTOR GEN., 21-109, AUDIT OF THE DRUG ENFORCEMENT ADMINISTRATION’S HEADQUARTERS-BASED OVERSIGHT OF ITS SUPPORTED FOREIGN LAW ENFORCEMENT UNITS (2021).

<sup>27</sup> VU candidates receive a polygraph examination unless the candidate is (1) not authorized to do so by the relevant Host Nation and (2) the Office of Foreign Operations approves a polygraph waiver for the candidate. Waivers are only considered for VU candidates; they are not available for SIU candidates or members. See DEA AM § 6541.5.

<sup>28</sup> See US DEP’T OF JUST. OFF. OF THE INSPECTOR GEN., 21-109, AUDIT OF THE DRUG ENFORCEMENT ADMINISTRATION’S HEADQUARTERS-BASED OVERSIGHT OF ITS SUPPORTED FOREIGN LAW ENFORCEMENT UNITS (2021).

<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

<sup>31</sup> *Id.*

identify communication vulnerabilities within the command and control structures of transnational organized crime networks.<sup>32</sup>

In addition to contributing to the disruption of criminal operations, JWIPs provide the DEA with important evidence needed for successful prosecution in the host nations or the United States.<sup>33</sup> Since their inception, the DEA and host nation counterparts have used JWIPs to seize significant quantities of narcotics bound for the United States as well as narcotics proceeds returning from the United States, leading to numerous arrests and prosecutions; and the information has in several circumstances prevented other violent crimes such as kidnapping, torture, and murder.<sup>34</sup> Where legally authorized, JWIPs provide evidence to host nation counterparts for their own cases and provide evidence to DEA for US-based cases.

Like many law enforcement techniques, the operational value of JWIP intercepts is evolving as the world has digitized and transnational organized crime networks shift more of their communications from traditional telecommunications platforms to digitally encrypted communications applications. Encrypted communications platforms present a challenge for the DEA and other US law enforcement agencies to effectively collect evidence that will support prosecutions of members of transnational organized crime networks. But the ability to partner effectively with foreign counterparts in identifying and addressing this investigative challenge through an evolving JWIP program remains a DEA priority.

#### **4. Attorney General Exempt Operations (AGEOs)**

Since 1985, the DEA has had the authority to seek approval from the US Attorney General to establish AGEOs to conduct undercover, sensitive investigative operations in the United States. These may involve the establishment of income-generating businesses and participation in undercover financial transactions to target, infiltrate, investigate and dismantle drug trafficking and money laundering organizations.<sup>35</sup> Authorized income-generating AGEO activities include, among others, opening and operating a commercial business, obtaining property, and depositing funds with a financial institution. AGEOs are an investigative and operational tool that the DEA employs in the United States to degrade and dismantle transnational organized crime networks.<sup>36</sup> The information gathered from AGEO can provide critical information for DEA operations, including DEA foreign operations.

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<sup>32</sup> *Id.*

<sup>33</sup> *Id.*

<sup>34</sup> *Id.*

<sup>35</sup> *See, e.g.*, US DEP'T OF JUST. OFF. OF THE INSPECTOR GEN., 20-071, AUDIT OF THE DRUG ENFORCEMENT ADMINISTRATION'S INCOME-GENERATING UNDERCOVER OPERATIONS (2020).

<sup>36</sup> *Id.*

The DEA has historically operated three different types of AGEOs: (1) Shelf AGEOs, (2) Full AGEOs, and (3) Border AGEOs.<sup>37</sup> Shelf AGEOs are used for conducting limited undercover money laundering activities to assess the viability of a long-term investigation or provide sufficient evidence in the near term.<sup>38</sup> Full AGEOs are designed to facilitate multiple transactions within a single investigation with the goal of dismantling a targeted criminal organization.<sup>39</sup> Border AGEOs were a hybrid between Shelf and Full AGEOs that had a nexus with illegal activity along the US southwest border. Since October 2020, DEA no longer operates any Border AGEOs.

Pursuant to law<sup>40</sup> and DOJ policy, the DEA Administrator and the Attorney General must approve the establishment of an AGEO. DEA offices submit proposals through the Sensitive Activity Review Committee (SARC), which is comprised of both DEA and DOJ representatives. Pursuant to DEA and DOJ policy, each AGEO must be reauthorized by the SARC every six months with final authorization from the relevant DOJ Deputy Assistant Attorney General (DAAG).

Prior to March 2017, the Operations Division handled the inspections of AGEOs. Starting in March 2017, the DEA gave the Inspection Division the responsibility of conducting all AGEO inspections. Between 2018 and the present, the DEA has regularly reviewed and updated its policies governing AGEOs to provide for enhanced policies, controls, and systems to strengthen oversight of AGEOs. In 2018, the DEA superseded all prior AGEO memos, guidance, and policies by establishing an updated interim AGEO Policy that provided additional oversight and tools necessary to manage AGEO investigations. A permanent DEA policy was put in place in April 2020, rescinding the prior interim 2018 policy, which further strengthened financial controls and reporting requirements for AGEO expenditures. The policy was further updated in 2021 and 2022 to include new documentation and reporting requirements to the SARC on objectives, performance metrics, and data related to financial transactions and seizures, among other information.<sup>41</sup> In parallel, the DEA's AGEO case management system is being updated to include new controls to identify any gaps in required reports and to ensure the accuracy and consistency of reported data, and to ensure appropriate levels of notification and management approval. In addition, the DEA, has developed a new policy requiring quarterly US Department of Treasury Financial Crimes Enforcement Network (FinCEN) reviews for each active confidential source supporting an AGEO.<sup>42</sup> The DEA's Inspection Division and Office of

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<sup>37</sup> *Id* at 3.

<sup>38</sup> *Id.*

<sup>39</sup> *Id.*

<sup>40</sup> Public Law 102-395, Sec. 102 as enacted by Public Law 104-132, Sec. 815(d).

<sup>41</sup> See Sections 1.8(B) and 1.16 of the DEA's Policy on Undercover Financial Investigations.

<sup>42</sup> See AGEO Policy Section 2.16.

Compliance continue to identify further enhancements and expect to provide further updates to the AGEO policy in 2023.

### **E. Recent Incidents in Foreign Divisions**

As noted above, the DEA's Foreign Divisions operate in high-risk environments that pose numerous compliance-related challenges including the risk of corruption of host-nation government and law enforcement officials, inadequate law enforcement capacity, and lack of the rule of law. These challenges have the potential to undermine the effectiveness of DEA's operations in accomplishing its mission.

In the past, there have been critical incidents involving the DEA's foreign operations in Mexico, Honduras, Colombia, and Haiti. Certain of these incidents have involved corruption, compromised intelligence, and civilian death.<sup>43</sup> The Review Team has considered these incidents and their contexts in reaching the findings and recommendations outlined below. Examples of specific incidents that have informed the Review Team include:

- **Former DEA Special Agent Jose I. Irizarry:** In September 2020, former DEA Special Agent Jose I. Irizarry pled guilty to money laundering and fraud charges.<sup>44</sup> Irizarry admitted to abusing his position as a DEA agent in Miami and Colombia to steal approximately \$9 million in funds from DEA AGEOs for the benefit of himself and his co-conspirators.<sup>45</sup> As part of this scheme, Irizarry received bribes and kickbacks worth at least \$1 million from members of the criminal networks he took an oath to investigate.<sup>46</sup> Irizarry has claimed that others within DEA either were involved in his misconduct or turned a blind eye to it. A DOJ investigation into this matter remains ongoing.<sup>47</sup>
- **Former Mexico SIU Member Ivan Reyes Arzate:** In 2018, Ivan Reyes Arzate, a former high-ranking commander in the Mexican Federal Police, and a DEA Mexico SIU Commander pled guilty to charges filed by the US Attorney for the Northern District of

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<sup>43</sup> See, e.g., US DEP'T OF JUST. OFF. OF THE INSPECTOR GEN., 21-109, AUDIT OF THE DRUG ENFORCEMENT ADMINISTRATION'S HEADQUARTERS-BASED OVERSIGHT OF ITS SUPPORTED FOREIGN LAW ENFORCEMENT UNITS (2021).

<sup>44</sup> US DEP'T OF JUST., FORMER DEA SPECIAL AGENT SENTENCED TO PRISON FOR MONEY LAUNDERING AND FRAUD SCHEME (Dec. 9, 2021), <https://www.justice.gov/opa/pr/former-dea-special-agent-sentenced-prison-money-laundering-and-fraud-scheme>.

<sup>45</sup> *Id.*

<sup>46</sup> *Id.*

<sup>47</sup> See Jim Mustian and Joshua Goodman, DEA's most corrupt agent: Parties, sex amid 'unwinnable war', AP (Dec. 1, 2022), <https://apnews.com/article/soccer-sports-la-liga-money-laundering-puerto-rico-38aed2da8cd0ac237aca28aa39321105>.

Illinois (ND Ill.) for obstruction of justice and conspiracy to obstruct a DEA investigation.<sup>48</sup> In 2020, Arzate was indicted on additional charges filed by the US Attorney for the Eastern District of New York (EDNY) related to three counts of cocaine trafficking conspiracy. Between 2003 and 2016, Arzate was a Mexican Federal Police Officer assigned to a DEA SIU and became the Mexico SIU Commander in 2008. As part of the 2020 indictment, the US Attorney's Office for the EDNY alleged that Arzate received bribes and passed sensitive DEA information to Mexican drug cartels.<sup>49</sup>

- **DEA VUs in Honduras:** In 2012, DEA VUs operating in Honduras conducted three drug interdiction missions alongside DEA agents, each of which involved critical incidents resulting in the deaths of four civilians and two suspects.<sup>50</sup> A 2017 DOJ OIG review found that there were gaps in internal understanding of the DEA's use of deadly force policies and inadequate mechanisms for reviewing and responding to DEA critical incidents.<sup>51</sup>
- **DEA Law Enforcement Partners in Haiti:** In 2009, the DEA disbanded its SIU in Haiti after the agency determined that (a) the SIU was out of compliance with DEA policies and vetting procedures (including four Haitian SIU members failing polygraph exams), and (b) the Haitian National Police requested dissolution after claiming to be overwhelmed by the DEA-imposed requirements.<sup>52</sup> According to the DOJ OIG's August 2021 report on the DEA's Foreign Operations, the DEA continued to work with and make payments to Haitian law enforcement units despite the dissolution of the SIU.<sup>53</sup> The OSC continues to investigate whistleblower allegations that the DEA failed to take appropriate measures to implement an effective seaport security program to assist

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<sup>48</sup> US DEP'T OF JUST., US ATT'Y'S OFF. N.D. ILL., FORMER MEXICAN FEDERAL POLICE COMMANDER ENTERS NO CONTEST PLEA TO OBSTRUCTING UNITED STATES INVESTIGATION INTO DRUG CARTEL (May 11, 2018) <https://www.justice.gov/usao-ndil/pr/former-mexican-federal-police-commander-enters-no-contest-plea-obstructing-united>.

<sup>49</sup> US DEP'T OF JUST., US ATT'Y'S OFF. E.D.N.Y., FORMER MEXICAN FEDERAL POLICE COMMANDER ARRESTED FOR DRUG-TRAFFICKING CONSPIRACY (Jan. 24, 2020), <https://www.justice.gov/usao-edny/pr/former-mexican-federal-police-commander-arrested-drug-trafficking-conspiracy>.

<sup>50</sup> See US DEP'T OF JUST. OFF. OF THE INSPECTOR GEN., 21-109, AUDIT OF THE DRUG ENFORCEMENT ADMINISTRATION'S HEADQUARTERS-BASED OVERSIGHT OF ITS SUPPORTED FOREIGN LAW ENFORCEMENT UNITS (2021).

<sup>51</sup> US DEP'T OF JUST. OFF. OF THE INSPECTOR GEN., 17-02, AND US DEP'T OF STATE OFF. OF THE INSPECTOR GEN., ESP-17-01, A SPECIAL JOINT REVIEW OF POST-INCIDENT RESPONSES BY THE DEPARTMENT OF STATE AND DRUG ENFORCEMENT ADMINISTRATION TO THREE DEADLY FORCE INCIDENTS IN HONDURAS (May 2017), <https://oig.justice.gov/reports/2017/o1702.pdf>.

<sup>52</sup> See US DEP'T OF JUST. OFF. OF THE INSPECTOR GEN., 21-109, AUDIT OF THE DRUG ENFORCEMENT ADMINISTRATION'S HEADQUARTERS-BASED OVERSIGHT OF ITS SUPPORTED FOREIGN LAW ENFORCEMENT UNITS (2021).

<sup>53</sup> *Id.*

Haiti with strengthening its counter-narcotics law enforcement capacity.<sup>54</sup> Allegations include inadequate training of Haitian officers, insufficient vetting of Haitian officers, and inadequate support for the 2015 investigation into the seizure of the M.V. *Manzanares* cargo ship located in Haiti.<sup>55</sup>

- **DEA SIUs and VUs in Colombia:** A 2015 OIG report found that the DEA’s Office of Professional Responsibility was aware of allegations that DEA agents and supervisors solicited prostitutes and engaged in serious misconduct while stationed in Colombia.<sup>56</sup> The DEA imposed only minor penalties ranging from two-day to ten-day suspension for the misconduct.<sup>57</sup> The OIG’s August 2021 report on the DEA’s Foreign Operations notes that a recent review conducted by the DEA determined that two Colombian SIU members were involved in these events.<sup>58</sup>

#### **F. Recent Enforcement Efforts Supported by Foreign Divisions**

In recent years, the DEA’s Foreign Divisions have supported the following successful enforcement actions against key members of transnational organized crime networks:

- **Indictment and Arrest of Juan Orlando Hernandez:** On January 27, 2022, Juan Orlando Hernandez, the former President of Honduras, was indicted by the US Attorney’s Office for the Southern District of New York (SDNY) on drug conspiracy and weapons charges. Prosecutors allege that he conspired to import cocaine into the United States, and aided and abetted weapons offenses by large-scale drug traffickers, by providing official Honduran government protection to drug traffickers in exchange for millions of dollars of drug proceeds he then used for political campaigns and to enrich himself and his family.
- **Extradition of Dario Usuga-David (aka “Otoniel”):** In 2003, the DEA’s Bogotá Country Office initiated an investigation targeting Dario Usuga-David, while he was a member of the Autodefensas Unidas de Colombia (AUC), a Colombian narco-terrorist

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<sup>54</sup> U.S. OFF. OF SPECIAL COUNS., LETTER TO THE PRESIDENT RE OSC FILE NOS. DI-16-1098, DI-18-1075 (July 30, 2021), <https://osc.gov/Documents/Public%20Files/FY21/DI-16-1098%2c%2018-1075/Redacted%20OSC%20Letter%20to%20President%20DI-16-1098%2c%20DI-18-1075.pdf>.

<sup>55</sup> *Id.*

<sup>56</sup> See US DEP’T OF JUST. OFF. OF THE INSPECTOR GEN., 15-04, THE HANDLING OF SEXUAL HARASSMENT AND MISCONDUCT ALLEGATIONS BY THE DEPARTMENT’S LAW ENFORCEMENT COMPONENTS (Mar. 2015), <https://www.oversight.gov/sites/default/files/oig-reports/e1504.pdf>.

<sup>57</sup> *Id.*

<sup>58</sup> See US DEP’T OF JUST. OFF. OF THE INSPECTOR GEN., 21-109, AUDIT OF THE DRUG ENFORCEMENT ADMINISTRATION’S HEADQUARTERS-BASED OVERSIGHT OF ITS SUPPORTED FOREIGN LAW ENFORCEMENT UNITS (2021).



group. Usuga-David was the target of 29 active Colombian investigations and had 57 active arrest warrants against him issued by the Colombian government. Usuga-David founded and established the Clan del Golfo (CDG), an international drug trafficking organization that distributed drugs in the United States. Under Usuga-David's leadership, the CDG was comprised of over 3,800 armed members and had a presence throughout Colombia. Usuga-David was indicted in 2009 by the US Attorney's Office for the SDNY and indicted again in 2015 both by the US Attorney's Offices for the EDNY and the Southern District of Florida (SD Fla.). Usuga David was arrested by Colombian law enforcement authorities on October 23, 2021 and extradited to the United States for trial on May 4, 2022. He pled guilty on January 25, 2023, to running a continuing criminal enterprise and related drug distribution charges.

- **Arrest of Juan Gerardo Trevino-Chavez (aka "Huevo"):** On March 15, 2022, Juan Gerardo Trevino-Chavez was arrested in San Diego, California on criminal charges relating to his alleged involvement in drug trafficking in Mexico and the United States. Trevino was indicted by the US Attorney's Office for the Western District of Texas (WD Tex.), and the indictment alleges Trevino is the leader of the Cartel Del Noreste drug cartel, the successor cartel to the Los Zetas drug cartel for which he was a leader, drug trafficker, enforcer, and weapons procurer.
- **Extradition of Juan Carlos Bonilla Valladeres (aka "El Tigre"):** On May 10, 2022, Juan Carlos Bonilla Valladeres was extradited to the United States on charges of conspiring to import cocaine into the United States and related weapons offenses involving the use and possession of machine guns and destructive devices. Bonilla Valladeres was the former chief of the Honduran National Police and was a member of the Honduran National Police between 1998 and 2016. The indictment and extradition were announced by the US Attorney's Office for the SDNY and the DEA.
- **Extradition of Kassem Hijazi:** On July 9, 2022, Kaseem Hijazi, a citizen of Brazil, was extradited to the United States from Paraguay on charges of money laundering and operation of an unlicensed money transmitting business as part of a cross-border money laundering operation. The US Attorney's Office for the SDNY indicted Hijazi, and the indictment alleges that Hijazi agreed to launder the proceeds of narcotics trafficking by operating an illegal money transmitting business, the proceeds of which were laundered into and out of the United States.
- **Arrest of Rafeal Caro Quintero:** On July 15, 2022, Mexican forces arrested Rafael Caro Quintero, a drug lord who was alleged to be responsible for the kidnapping and murder of DEA Special Agent Enrique "Kiki" Camarena in 1985. Quintero is awaiting extradition to the United States to stand trial.

## **G. DEA's Recent Initiatives Relevant to the Review Team's Assessment**

### **1. Breaking Down Information Silos**

The DEA is in the process of modernizing its data storage systems and analytical capacity to further break down information silos across the agency's applications and databases. The goal of this effort is to provide unified data warehouses and databases to house all of DEA's information and deploy enhanced analytic capabilities to further support DEA's operations while ensuring more proactive oversight of compliance and privacy risks. Relatedly, the DEA is in the process of developing a new enterprise-level operating system that will provide front-line analysts and agents with new capabilities to access and action on information collected from across all the DEA's domestic and foreign offices.

### **2. Establishment of Sinaloa and CJNG Counter Threat Teams**

The DEA has established Counter Threat Teams (CTT) focused on two transnational organized crime networks responsible for the importation of fentanyl and methamphetamine into the United States: the Sinaloa Cartel and Cartel Jalisco Nueva Generacion (CJNG).<sup>59</sup> The teams started their work on September 19, 2022, and are using new methods and tools to exploit data and information being collected across the DEA. The DEA's IT and Data Science teams have created new tools and applications to assist the DEA's Counter Threat Teams with more efficient search and analysis of data and information. The teams are currently taking the following actions, among others:

- Identifying, mapping, and targeting the full criminal networks of each cartel;
- Developing and implementing a strategic plan for global targeting of cartel members and associates; and
- In coordination with SOD, providing comprehensive target packages to relevant DEA field offices (both domestic and foreign) on key members of the networks.

As discussed further below, the DEA's Domestic Divisions and Foreign Divisions are in the process of setting up complementary Counter Threat Teams in their areas of responsibility.

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<sup>59</sup>See, e.g., DEA, DEA ANNOUNCES RESULTS OF ENFORCEMENT SURGE TO REDUCE THE FENTANYL SUPPLY ACROSS THE UNITED STATES (Sep. 27, 2022), <https://www.dea.gov/press-releases/2022/09/27/dea-announces-results-enforcement-surge-reduce-fentanyl-supply-across>.

### 3. DEA Office of Strategic Planning

The DEA created a new Office of Strategic Planning within Headquarters to develop strategic planning processes to support operational targeting. The Chief of Strategic Planning works to ensure DEA's operational targeting and enforcement priorities are aligned with the DEA's strategic priorities and key areas of interest including (1) preventing drug-related deaths, (2) countering the violence and instability created by transnational organized crime networks trafficking drugs, and (3) protecting US national security interests.<sup>60</sup> The Office of Strategic Planning helps coordinate operational targeting and planning efforts among the DEA's Domestic and Foreign Divisions, as well as Headquarters-based operational divisions such as the Counter Threat Teams and SOD.

### 4. Foreign Operations Compliance Oversight

To date, the DEA has closed eight out of ten recommendations and resolved<sup>61</sup> the remaining two recommendations from the DOJ OIG to enhance the oversight of compliance risks that the DOJ OIG identified arising out of the agency's foreign operations and is taking steps to close the remaining two recommendations.<sup>62</sup> These measures include, among others: <sup>63</sup>

- New procedures and controls to ensure Headquarters oversight of country offices and the assistance each office is providing to host nation law enforcement agencies;
- Requiring country offices to conduct risk assessments for all foreign counterparts and units and to provide those assessments to the relevant Headquarters components; and
- Developing new SIU, VU, and JWIP metrics to better measure the efficacy of SIU/VU/JWIP programs both at the local and agency-wide levels in real time.

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<sup>60</sup> Interview with DEA Chief of Strategic Planning.

<sup>61</sup> As defined by the DOJ OIG, "Resolved" means that DOJ or the non-DOJ federal agency has agreed to implement the DOJ OIG recommendation or has proposed actions that will address the DOJ OIG recommendation. *See, e.g.,* US DEP'T OF JUST. OFF. OF THE INSPECTOR GEN., 22-094, RECOMMENDATIONS ISSUED BY THE OFFICE OF THE INSPECTOR GENERAL THAT WERE NOT CLOSED AS OF JUNE 30, 2022 (2022), <https://oig.justice.gov/sites/default/files/reports/22-094.pdf>.

<sup>62</sup> The two recommendations that are resolved and have not yet been closed by the DOJ OIG are recommendations 6a and 10. The DEA continues to work to close both recommendations and remains in consultation with the DOJ OIG on its progress.

<sup>63</sup> July 5, 2022 DEA Letter to DOJ OIG re Status of Recommendations 1, 2b, 3, 4c, 4d, 6a, 7, 9, and 10; *see also* September 1, 2022 DOJ OIG Memorandum to DEA Administrator re Action Required on the Audit of the Drug Enforcement Administration's Headquarters-Based Oversight of its Supported Foreign Law Enforcement Units Audit Report 21-109.

## **IV. OBSERVATIONS AND RECOMMENDATIONS**

### **A. High Level Takeaways from Review Team**

The DEA's foreign operations provide critical support for advancing the DEA's and other US government agencies' missions. The DEA's global work also has furthered the rule of law abroad in partnership with its host nation counterparts.

The DEA's international efforts are complicated by the fact that the transnational organized crime networks responsible for the current US drug threats thrive in countries with pervasive corruption and inadequate law enforcement capacity. To be effective, the DEA must operate in an effective and compliant way in these challenging environments.

After talking to more than 100 individuals and reviewing and analyzing scores of relevant documents, including internal agency policies, personnel manuals, training materials, internal agency assessments and analyses, as well as reports prepared by the DOJ OIG and the OSC, the Review Team identified three strategic recommendations for the DEA to consider in enhancing its effectiveness and compliance overseas:

- I. The DEA should continue and accelerate towards a "One DEA" approach to ensure foreign operations consistently prioritize current US drug threats and the transnational organized crime networks behind the threats.
- II. The DEA should enhance compliance efforts in its international offices by deploying a more robust risk-based approach.
- III. The DEA should immediately and then regularly assess its foreign footprint to maximize impact against current US drug threats and the transnational organized crime networks responsible for these threats.

The following sections describe the Review Team's observations with respect to each strategic recommendation, including (1) the DEA's current strengths, (2) areas of improvement, and (3) detailed recommendations. In total, the below sections contain fourteen detailed recommendations for consideration regarding the DEA's foreign operations.

**STRATEGIC RECOMMENDATION 1 – THE DEA SHOULD CONTINUE AND ACCELERATE TOWARDS A “ONE DEA” MODEL TO ENSURE INTERNATIONAL OPERATIONS CONSISTENTLY PRIORITIZE CURRENT US DRUG THREATS AND TRANSNATIONAL ORGANIZED CRIME NETWORKS.**

Overview

The DEA has had significant operational successes both in its Foreign and Domestic Divisions, but historically the DEA’s operational effectiveness has at times been limited by silos between Divisions. These silos have hampered the DEA’s ability to pursue a global strategy aimed at priority targets causing the greatest harm to US communities. The drug threats facing the United States are evolving rapidly as transnational organized crime networks become increasingly agile and adaptive to changing conditions. In response, the DEA needs to become even more nimble and flexible in terms of its ability to share information internally and prioritize the targets that pose the greatest threat to the health and safety of US communities.

To address these evolving threats, over the past year, the DEA’s leadership has moved towards a “One DEA” approach to improve coordination among the agency’s Foreign and Domestic Divisions. This approach inclines the entire DEA towards targeting, degrading, and ultimately dismantling the highest priority transnational organized crime networks.

The DEA has an opportunity to further strengthen its “One DEA” approach to meet the evolving drug threats by breaking down additional information and data silos between Divisions, developing strategic plans for each Foreign Division aligned with targeting priority criminal networks, and enhancing data-driven case coordination across all of DEA. At the same time, as the DEA enhances its data collection and analytic capabilities, it is essential that the agency put in place robust controls to maintain the quality, accuracy, and reliability of the data leveraged for operational decision making. These controls are essential to maintaining the integrity of the DEA’s operations and further mitigating the risk of future critical incidents or other operational errors.

Key Takeaways

*Observations*

The DEA has made recent strides toward a “One DEA” approach to target and focus its operations agency-wide on degrading and dismantling the two transnational organized crime networks currently posing the gravest threat to the health and safety of US communities: (1) the Sinaloa Cartel and (2) the CJNG. As part of these efforts, the DEA’s leadership is taking steps to break down operational and information silos within the agency to ensure that the Foreign and Domestic Divisions are focused on identifying, targeting, arresting, and ultimately prosecuting the most senior members of these two cartels. These steps have included the creation of the Counter Threat Teams, drawing from resources across the DEA to better leverage the vast quantities of data that DEA collects both domestically and overseas to map each cartel’s

members and operations globally. The teams are intentionally interdisciplinary and are made up of experienced field agents with on-the-ground experience and connections in key geographies, analysts who specialize in complex investigations involving money laundering, and trafficking of precursor drugs, as well as data scientists who can build tools and exploit the raw data available to the teams to identify better leads. One theme that emerged from interviews is that on-the-ground agents are not always familiar with the role of analysts, and vice versa.<sup>64</sup> Embedding both agents and analysts together helps bridge silos between teams and educates both analysts and agents on how they can best support one another in their shared enforcement work. Further, the DEA is investing in technology and resources to better leverage the data and information that agents collect from the field. DEA leadership is then using those tools to better synthesize that information to empower both Foreign and Domestic Divisions to prioritize and strengthen operations targeting these two cartels. These efforts are having a positive impact, but more work can and should be done to build on the results.

### *Areas of Strength*

The Review Team identified the following key areas of strength as the agency continues to move towards a “One DEA” approach prioritizing the most pressing US drug threats:

- **Partnerships with Foreign Law Enforcement.** The DEA’s Foreign Divisions have developed strong partnerships with foreign law enforcement counterparts. In interviews, foreign-based DEA personnel described these relationships as “critical” and “invaluable” in advancing DEA’s enforcement priorities.<sup>65</sup> These partnerships have improved law enforcement cooperation in critical regions of the world and furthered the rule of law globally. As discussed further in Strategic Recommendation 2 below, particularly over the past year, the DEA has taken meaningful steps to update its policies, procedures, and practices to further improve controls to vet and oversee the foreign law enforcement partners with whom it works to mitigate potential compliance risks. The DEA is also leveraging technology to better track these relationships with foreign counterparts and the compliance challenges they pose.
- **Information and Informants.** The DEA’s Foreign Divisions have similarly developed an extensive network of sources which provide critical information and data on transnational organized crime networks. The value of these sources is evident from the operational success that the DEA has had in recent years, many of which have relied extensively on foreign DEA informants.

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<sup>64</sup> See, e.g., Interview of Andean Region Executive Staff.

<sup>65</sup> See, e.g., Interview of Enforcement Group Supervisors.

- **Support for US Government Global Mission.** The DEA’s Foreign Divisions play a critical role in supporting the US government’s law enforcement and diplomatic mission abroad through its partnerships with foreign law enforcement counterparts, on-the-ground information and informant development, and its subject matter expertise in particular regions.
- **Information Infrastructure.** The DEA has begun to modernize its information infrastructure to more effectively unify and leverage the data collected by the agency. This will enable DEA analysts and data scientists to create more actionable, relevant, and productive operational leads to support the operational work of agents in the field. As part of this effort, the DEA is investing in centralizing information into data warehouses and databases, and developing a new agency-wide operating system that will provide both analysts and enforcement teams with tools to enhance operational execution and decision making.

### *Areas for Improvement*

Through its interview with DEA personnel and review of DEA materials, the Review Team identified the following areas for improvement:

- **Consistency of Information Sharing.** The dispersed nature of the DEA’s global operations has made consistent, effective information sharing challenging. The DEA will need to continue to build on the agency’s recent efforts to increase information integration and invest in modern data systems including databases, analytical tools, geospatial information, tracking, and current operating systems. As one foreign-based DEA employee noted in an interview, information sharing between analysts and the Foreign Division’s is “critical” to “connect the dots[.]”<sup>66</sup>
- **Information and Operational Silos.** Silos among DEA foreign offices, domestic offices, and Headquarters hamper the sharing of operational information. Historically, the DEA’s culture has not consistently incentivized the sharing of information across offices, agents, and teams, even when those teams have been targeting the same transnational organized crime networks. For example, one interviewee suggested that there is a perception within DEA that the only role of the foreign field offices is to support the domestic offices, and that to address this the agency should pursue an “overarching unity of efforts” towards operational priorities identified by DEA leadership with a “harmonizing message and themes that translate” to both domestic and foreign offices.<sup>67</sup>

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<sup>66</sup> Interview of incoming Regional Director for the Far East Region.

<sup>67</sup> Interview of Chief of Strategic Planning.

- **Coordination on Current Threats.** The DEA’s Foreign Divisions’ operations have historically not always been informed by coordinated, data-led processes to identify current US drug threats. A theme that emerged from interviews is that regional leadership have not consistently identified the US priority threats or the agency’s broader enforcement strategy, and historically, DEA Headquarters may not have identified key priorities for each region. At times, DEA country offices prioritized local operations driven by the interests of foreign counterparts rather than DEA-determined strategic targets most responsible for current US drug threats. The DEA needs to continue to invest in processes, systems, and metrics that will allow the DEA to better track each Foreign Division’s contributions to DEA enforcement priorities (e.g., metrics measuring current progress towards degrading and dismantling the Sinaloa and CJNG cartels).
- **Organization and Governance.** The DEA’s domestic offices, foreign offices, and Headquarters historically have been organized and governed around geography rather than evolving US drug threats and the transnational organized crime networks behind those threats. Resources should flow to the locations best equipped to tackle the most pressing threats and should not be based on historical precedent or dated risk assessments. At a minimum, the DEA should consider resourcing Foreign Divisions to reflect their abilities to combat current US drug threats rather than simply to reflect their geographical proximity or reach.
- **Data Utilization.** Given the siloed nature of the DEA’s legacy data infrastructure and historical practices that inconsistently incentivized information sharing, the DEA should strive to more effectively leverage its data to better support its operational targeting decisions. As the DEA continues to modernize and unify its data infrastructure and incentivizes agents to contribute actionable information to the agency’s new data systems, the DEA will need to ensure that it is fully harnessing the data and creating the necessary connections to make it a valuable resource.

## Recommendations

### **Rec. 1.1: Continue to operationalize processes and data systems to further align Headquarters and Foreign and Domestic Divisions on current US drug threats and the transnational organized crime networks behind them.**

One consistent theme that emerged from the Review Team’s work was that in the past information had been siloed across DEA offices with data segregated across various databases. As noted above, over the past year, DEA leadership has made significant progress in advancing a “One DEA” approach across the Foreign and Domestic Divisions to focus operational efforts on dismantling and degrading the transnational organized crime networks posing the most



significant threat to US communities. For example, the DEA's leadership has established new Counter Threat Teams dedicated to analyzing data and information across the DEA's Domestic and Foreign Divisions to develop actionable leads on key members of the Sinaloa and CJNG cartels, a top DEA enforcement priority. These teams are synthesizing information and data that were previously siloed to identify the highest value targets and identify operational opportunities to degrade and dismantle both cartels, as well as the infrastructure that supports their networks.

Going forward, it is essential that DEA leadership institutionalize policies, procedures, and practices to maintain the continuity and durability of the "One DEA" approach. The DEA should continue and accelerate its efforts to leverage data and information to identify evolving US drug threats to ensure that both Foreign and Domestic Divisions are focused on criminal networks responsible for the greatest harm to the health and safety of US communities.

For example, to maintain the long-term sustainability of the "One DEA" approach, DEA leadership can institutionalize protocols for formally assessing and designating on a regular cadence the transnational organized crime networks responsible for the greatest current threats to the health and safety of US communities. A formal designation process could allow the DEA's leadership to regularly set the agency's operational priorities which will in turn inform the strategic planning of each Foreign Division recommended further below.

In addition, the DEA can continue to modernize its analytical capabilities and further develop tailored metrics for each Foreign Division to allow supervisors to measure the Foreign Divisions' progress towards the agency's current enforcement priorities (e.g., metrics measuring progress towards degrading and dismantling the Sinaloa and CJNG cartels). DEA should continue to develop technological resources and systems to better leverage and operationalize DEA's data.

**Rec. 1.2: Consider institutionalizing Foreign Divisions' strategic planning process to include operational impact against current US drug threats, as well as compliance issues.**

As the agency continues to execute on its "One DEA" approach, the DEA should consider institutionalizing processes for Foreign Divisions' strategic plans focusing on operational impact towards the DEA's US drug threat priorities, as well as compliance issues. These processes could include templates, training, and guidance to assist the Foreign Divisions in tailoring their strategic plans to address agency priorities based on their relative regional circumstances while considering localized compliance risks. The DEA should consider developing inputs to inform the development of Foreign Divisions strategic plans. As part of these efforts, the DEA could, for example, establish defined multi-year time horizons for each Foreign Division-specific strategic plan with processes to update each plan on an annual basis.

To further its ability to nimbly respond to evolving drug threats, the DEA could continue develop analytical capacity to measure and evaluate progress towards each Foreign Division strategic plan, primarily in terms of efforts against current priority US drug threats. Future analytical

tools could be used to provide real-time updates to Headquarters, DEA leadership, and the relevant DEA component offices to ensure alignment of operational efforts towards priority transnational organized crime networks. To evaluate progress, DEA could implement processes for ongoing oversight including quarterly reviews by DEA leadership of each Foreign Division's progress towards its strategic plan assisted by monthly metric reports analyzing progress against current US threats.

**Rec. 1.3: Improve information flow between Foreign and Domestic Divisions to align all DEA agency operations against current US drug threats.**

To continue to build on the "One DEA" approach to countering US drug threats, the DEA should consider formalizing protocols and designating responsibilities to institutionalize operational information flows among the DEA's Foreign and Domestic Divisions. One theme that emerged from interviews was the importance of ensuring material information is routed to the appropriate offices to further ongoing investigations. DEA should continue to build upon the work it is already doing to ensure that leads are being shared with the relevant offices and agents.

To accomplish this, the DEA should consider, for example, developing protocols to ensure that all relevant operational and analytical units have visibility into information flowing between Foreign and Domestic Divisions with relevant processes for sharing investigative leads between the Foreign and Domestic Divisions with systems for follow up. Maintaining visibility into operations across divisions would enhance oversight and allow DEA leadership to effectively align and coordinate agency-wide operations around the transnational organized crime networks that pose the greatest threats to US communities.

The DEA Counter Threat Teams and the technology that the DEA is building can also play an important role in ensuring that leads are routed to appropriate Foreign and/or Domestic Offices, and tracking and reporting follow up to DEA leadership.

## **STRATEGIC RECOMMENDATION 2 – THE DEA SHOULD ENHANCE COMPLIANCE EFFORTS IN ITS FOREIGN OPERATIONS BY DEPLOYING A MORE ROBUST RISK-BASED APPROACH.**

### Overview

Integrity is a core DEA value: the agency expects its Foreign Divisions, and its agents and employees stationed abroad, to operate with “[u]ncompromising personal, professional, and institutional integrity.”<sup>68</sup> Trust in the integrity of the DEA’s foreign operations strengthens the rule of law and is essential for maintaining credibility with the agency’s foreign law enforcement counterparts. Most importantly, maintaining compliance in the DEA’s Foreign Operations is fundamental for successfully identifying, targeting, arresting, extraditing, and ultimately prosecuting, convicting, and sentencing members of transnational organized crime networks that pose the greatest threat to US communities.

DEA leadership, and the heads of the agency’s component offices and divisions, must set the “tone from the top” on compliance issues. The DEA’s current leadership has embraced this opportunity by empowering the DEA’s compliance and inspections teams to strengthen the agency’s approach to misconduct, discipline, and risk management. The agency should continue to emphasize a culture of compliance and consider expanding compliance resources in its foreign operations, adapting training to better address the unique challenges posed by overseas operations and further leveraging inspections of offices across the Foreign Divisions, as well as taking steps towards auditing foreign operations at a program-wide level with compliance-tailored metrics to proactively identify systemic issues and emerging risks.

### Key Takeaways

#### *Areas of Strength*

DEA leadership has already pursued key enhancements to the agency’s approach to compliance, inspections, and employee discipline. Further, the DEA is creating systems to improve supervisor accountability on compliance issues. In addition to these enhancements, the Review Team identified the following areas of strengths in the DEA’s current approach to compliance based on interviews and reviewed materials:

- **Foreign Operations Compliance Oversight.** Interviews and documents demonstrated that the DEA has already largely implemented the recommendations from the DOJ OIG to enhance the oversight of compliance risks arising out of the agency’s foreign operations. These measures include, among others:<sup>69</sup>

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<sup>68</sup> About DEA, <https://www.dea.gov/who-we-are/about>.

<sup>69</sup> July 5, 2022 DEA Letter to OIG re Status of Recommendations 1, 2b, 3, 4c, 4d, 6a, 7, 9, and 10.

- **Procedures and Controls for Foreign Law Enforcement Partnerships.** The DEA updated the DEA Agents Manual (AM) to include a new policy (§ 6551) addressing both (a) the DEA’s interaction with its foreign partners and (b) Headquarters oversight of country offices, including the requirement that country offices must provide quarterly reports to the corresponding Office of Foreign Operations section on assistance provided to host nation law enforcement agencies.<sup>70</sup> Specifically, AM § 6551 “formalizes DEA Headquarters oversight of its country offices (CO) by establishing policy and procedures that DEA country office personnel must follow when working with Foreign Counterpart Agencies,” including new procedures for ensuring vetting and reporting requirements are met.
- **After-Action Reviews of Critical Incidents.** The DEA has updated its policy regarding after-action reviews of critical incidents involving foreign counterparts. The DEA’s policy (AM § 6551.3(F)) regarding the reporting and tracking of critical incidents involving SIU and VU programs assigns specific roles within Headquarters to track SIU/VU related critical incidents, monitor outcomes, and assess incidents to identify “possible indicators of systemic issues that may require oversight enhancements and program improvements.”<sup>71</sup>
- **Foreign Counterpart Risk Assessments.** The DEA has implemented new policies and procedures to require country offices to conduct risks assessments for all foreign counterparts<sup>72</sup>/foreign counterpart units<sup>73</sup> and to provide those risk assessments to Headquarters as part of their existing host nation law enforcement agencies reporting.
- **Tracking Training of Host Nation Law Enforcement Agencies.** The DEA will require the International and Personnel Recovery Training Sections at Headquarters to track all training of foreign counterparts and provide that information to the Office of Foreign Operations Program Manager quarterly.
- **Compliance with Statutory Vetting Requirements.** The DEA has implemented new conditions that foreign counterparts must meet in order to receive DEA or

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<sup>70</sup> DEA AM § 6551.3(A) defines a Foreign Counterpart Agency as, “a foreign government agency with which DEA works or cooperates when fulfilling its law enforcement mission overseas.”

<sup>71</sup> DEA AM § 6551.3(F).

<sup>72</sup> DEA AM § 6551.3(A) defines a Foreign Counterpart as, “an employee of an [Foreign Counterpart Agency “FCA”] who, with the FCA’s knowledge, is working bi-laterally with DEA in its efforts to fulfill its law enforcement mission overseas.”

<sup>73</sup> DEA AM § 6551.3(A) defines a Foreign Counterpart Unit as, “a law enforcement sub-unit controlled by an FCA which may assist DEA in fulfilling its law enforcement mission overseas.”

related US government funding. This includes a requirement that all foreign counterparts must be vetted prior to receiving DEA and US government assistance, including that (a) all foreign law enforcement organizations must satisfy “Leahy vetting” requirements and (b) all foreign prosecutor partners must complete Narcotics and Dangerous Drugs Information System (NADDIS)<sup>74</sup>/National Crime Information Center (NCIC)<sup>75</sup> checks that search for criminal history information and satisfy inquiries with members of the Embassy’s Country Team Law Enforcement Working Group.

- **Tracking and Assessing Performance of SIUs, VUs, and JWIPs.** The DEA has adopted new metrics that will allow DEA country offices to link case-specific information to their country’s SIU, VU, or JWIP programs. These new metrics will allow managers both within Headquarters and country offices themselves to better monitor and analyze in real-time the efficacy of SIU/VU/JWIP programs both at the local and agency-wide levels.
- **SIU, VU, and JWIP Program Metrics.** The DEA has developed dashboards that will allow the International Impact Section to monitor the cases that all SIUs, VUs, and JWIPs are working across all of DEA’s country offices. Headquarters also will be able to use these dashboards to analyze the productivity and success of all SIUs, VUs, and JWIPs worldwide by using metrics such as the number of open cases, number of arrests, the amount and type of narcotics seized, and any asset seizure values.
- **Compliance and Inspection Coordination.** The DEA’s Chief of Compliance and Chief Inspector have taken steps to enhance coordination between their respective offices to both (1) mitigate risks identified and/or escalated from DEA country offices and (2) implement solutions for systemic and emerging risk issues identified during inspections in the Foreign Divisions. In the event that the Inspection Division identifies systematic deficiencies across programs, the issues are escalated to the Office of Compliance to develop solutions, including any necessary new policies, to address the root causes going forward.
- **Employee Disciplinary Review Process.** The Inspection Division, in partnership with the Office of Chief Counsel and Human Resources Division, reporting to DEA

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<sup>74</sup> NADDIS is a DEA data system containing DEA reports and records on individuals. A NADDIS review will identify any prior reports involving potential foreign prosecutor partners.

<sup>75</sup> The NCIC contains data on persons who are the subject of protection orders, active criminal warrants, immigration violations, among other relevant data. A NCIC review will identify potential criminal history information involving potential foreign prosecutor partners.

leadership, updated the disciplinary adjudication process and associated penalties for misconduct to include new controls and procedures permitting employment termination for a single finding of misconduct that is sufficiently serious. This material change to the DEA's employee discipline policy will change the historical approach which previously prevented DEA leadership from taking certain actions against first-time violators.

- **Hiring Policies.** The DEA has updated its hiring policies and heightened its disciplinary standards, including screening out any applicant who fails a polygraph and conducting an enhanced review of any prior law enforcement internal affairs record for an applicant.
- **AGEO Policies, Controls, and Oversight Systems.**<sup>76</sup> The DEA has developed new policies, controls, and systems to strengthen retrospective oversight of AGEOs by the SARC. These changes include Sections 1.8(B) and 1.16 of DEA's Policy on Undercover Financial Investigations which establishes new documentation requirements to strengthen retrospective oversight of ongoing AGEOs, including requirements to report on objectives and metrics on accomplishments to date, objectives to be completed by any requested extension, data related to financial transactions and seizures, and the date of the most recent Inspection Division audit, among other information. Under this policy, the DEA is required to submit this documentation to the SARC every 6 months to request an extension of the AGEO. Further, the DEA's new AGEO policy requires the DOJ DAAG with responsibility for the DEA to provide final approval of AGEO requests. In addition, to ensure the accuracy and consistency of data reported, the DEA has implemented new controls in its AGEO IT modules that prevent DEA agents from submitting incomplete information on reports. The DEA's updated policies also include preventative and detective independent controls that establish a \$500 review threshold for any non-undercover expenditure that does not fall within a presumptively proper category. And the updated AGEO policy lowers the threshold requiring Headquarters approval for any non-undercover expenses over \$500 (reduced from \$1,000), and approval of any equipment purchase over \$250 (reduced from \$500).<sup>77</sup>

#### *Areas for Improvement*

- **On-The-Ground Legal and Compliance Resources.** The DEA's Foreign Divisions do not have legal and compliance personnel support on the ground and instead rely on resources from Headquarters or the Domestic Divisions. The lack of on-the-ground legal and compliance personnel can create barriers to timely identifying and escalating emerging compliance risks to the Office of Compliance and the Inspection Division. And the absence of legal and compliance personnel physically stationed in the Foreign

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<sup>76</sup> Sourced from interviews and materials prepared by Office of Compliance.

<sup>77</sup> *Id.*

Divisions has the potential to limit the quality and quantity of training and other support and oversight related to compliance issues.

- **Foreign Division Inspections and Compliance-Specific Metrics.** Currently, the Inspection Division conducts full inspections of each country office every four years and conducts separate inspections of SIUs and VUs every two years. The International Impact Section conducts its own inspections of the SIU and VU programs during Inspection Division off-years. Beginning in FY 23, each Office of Foreign Operations Section will conduct a biennial foreign counterpart program review for every office in their area of operation during Inspection Division off-years. However, historically, inspections of the Foreign Divisions have been infrequent with multi-year gaps and not sufficiently tailored to the unique risks of each DEA country office. Specifically, and as discussed further below, DEA country offices in jurisdictions that present higher risks in terms of corruption within the foreign counterpart government, rule of law challenges, and presence and corrupting influence of members of the highest priority transnational organized crime networks do not necessarily receive greater resources from the Inspection Division than country offices lacking those factors. Relatedly, the DEA is in the process of developing compliance-specific and real time metrics tailored to the unique risks associated with each country office, which also could serve as an early-warning system for emerging compliance risks. New systems could be developed to further support the real-time reporting of AGEO-specific metrics and transactions associated with key AGEO controls could be developed to allow for more proactive Office of Compliance and Inspection Division oversight into emerging risks related to ongoing AGEOS. We understand the DEA is in the process of developing real-time reporting systems for AGEOS.
- **Compliance Training.** The training and onboarding and offboarding processes for agents serving overseas could be further standardized to prepare agents for the unique compliance challenges of carrying out the DEA’s US-focused mission from international offices. One theme that emerged from interviews was that there can be a lack of knowledge about compliance requirements in the field or localized corruption risks.<sup>78</sup> For example, one Agent described the experience of transitioning to a foreign office coming from a domestic office experience as “drinking from a fire hydrant” and stated that operating abroad was a “completely different” world from domestic operations. As another interviewee described, there are a “lot of opportunities” for DEA efforts to go “sideways” overseas, suggesting a need for more targeted training.<sup>79</sup> DEA Regional

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<sup>78</sup> See, e.g., Interview of Acting Chief of Intelligence; Interview of DEA Special Agents in Dominican Republic, Foreign Visit.

<sup>79</sup> Interview of DEA Special Agent-in-Charge, Louisville Field Office.

Directors, Assistant Regional Directors, Country Attaches, and Group Supervisors stationed overseas would benefit from increased resources and more tailored training to ensure compliance in the teams they lead. The DEA also could do more to ensure supervisors are effectively evaluated and ultimately held accountable for compliance-related issues.

### Recommendations

#### **Rec. 2.1: Consider enhancing compliance resources to support Foreign Divisions and enhance the impact of inspections in Foreign Divisions.**

The Review Team observed that there are no dedicated legal or compliance resources supporting each Foreign Division. This lack of dedicated compliance resources can limit the DEA's timely detection of compliance issues as well as the quality and quantity of compliance support and training. As the agency adopts a nimbler and more flexible approach to responding to evolving US drug threats, the DEA also should invest in additional compliance resources, including technological resources, to respond to emerging compliance risks in the Foreign Divisions. The Review Team noted that the DEA has historically relied primarily on its operational personnel in the international offices to escalate compliance risks directly to Headquarters. While this approach can allow for effective reactive responses, it does not optimize the opportunity for Office of Compliance and Inspection Division personnel to proactively identify and address emerging compliance risks.

Additional Office of Compliance and Inspection Divisions resources dedicated to the Foreign Divisions can further build a culture of compliance and allow Office of Compliance and Inspection Division personnel to develop expertise in the risks unique to different Foreign Divisions while also developing trust and credibility with personnel in each country office. For example, the DEA could consider additional compliance resources in the Foreign Divisions to help timely and proactively identify and address emerging risks unique to each Foreign Division and assist in training, support, and oversight regarding compliance issues. DEA can also leverage technological resources to further enhance the ability of the Foreign Divisions, the Inspection Division, and the Office of Compliance to have real-time oversight and data relating to compliance issues and risks.

#### **Rec. 2.2: The Office of Compliance and the Inspection Division should consider prioritizing program-wide rather than office-based approaches to inspections.**

One theme that emerged from interviews was that identifying compliance risks can often be better addressed through program-wide reviews, since individual office-based reviews may not surface systemic issues across programs. Such an approach would allow for better detection of systemic and emerging risks across Foreign Divisions' programs beyond individual country offices. The Office of Compliance and the Inspection Division should assess the Foreign



Divisions' programs with the highest compliance-related risks for program-based inspections and audits. Further, the DEA's program-based approach to audits should leverage the agency's unified data systems and databases in development to proactively identify and analyze program-specific metrics to monitor compliance with the agency's policies and financial controls. For example, with respect to AGEOs, the DEA could use analytical tools and technology to monitor real-time compliance with financial, vetting, and expense documentation requirements, and deadlines for each AGEO.

**Rec. 2.3: Assess compliance risks specific to each Foreign Division to more effectively calibrate trainings, inspections, and other compliance-related efforts.**

A common theme the Review Team identified was the need to strategically assess the unique compliance risks for each Foreign Division and to then tailor compliance-related efforts to mitigate those unique, evolving risks. Such an approach would allow the agency to prioritize its Office of Compliance and Inspection Division resources in those Foreign Divisions and country offices with the greatest compliance risks. The DEA could further enhance its compliance and inspection functions by focusing on proactively detecting and remediating risks across the DEA's country offices.

One approach the DEA could consider is developing risk-based compliance assessments for each Foreign Division and its country offices. Such a framework would evaluate the potential opportunities each country office has to further the DEA's efforts against the transnational organized crime networks that pose the greatest threat to US communities as well as the compliance and integrity risks associated with partnering with foreign law enforcement in a particular country. Such a framework would help the DEA proactively identify the unique risks of each Foreign Division, assess its foreign footprint and the risks of operating in particular locations, and assign compliance and inspections resources, including technological resources, as necessary to address these risks.

The DEA's Office of Compliance and Inspection Division could consider collaborating with country offices, the Office of Foreign Operations, and the agency's data scientists to develop signals tailored to the unique compliance risks for (1) each country office and (2) each Foreign Division program to be used in conjunction with other compliance oversight and management tools and systems. These signals would provide supervisors and program managers in country offices, Foreign Divisions, and Headquarters with real-time oversight into emerging compliance risks and effectively serve as an early warning system of potential incidents occurring across Foreign Divisions' programs and within specific country offices.

**Rec. 2.4: The DEA should provide both standardized and enhanced training and aligned onboarding/offboarding processes for foreign-assigned agents prior to, during, and after assignment.**

A common theme that emerged among interviewees is the need to improve the assignment process for DEA personnel to foreign offices, as well as enhanced training on compliance risks. The DEA could consider strengthening training for Foreign Division-assigned personnel through enhanced mandatory agency-wide compliance training as well as mandatory compliance trainings tailored to each Foreign Division prior to, during, and after assignment.

To enhance continuity and operational integrity during personnel transitions, the DEA can also improve onboarding and offboarding processes tailored to the unique challenges of each foreign posting. The Office of Foreign Operations, Compliance, OPR, and Security Programs could play a central role in the development of the enhanced onboarding processes that DEA personnel receive prior to assignment, and during offboarding processes following an assignment.

Examples of enhanced onboarding and offboarding processes could include:

- Requiring attestation of adherence to the DEA Code of Conduct prior to assignment;
- Where possible, ensure that outgoing personnel cannot depart a foreign country before replacement personnel are permanently posted to provide a formal transition of roles; where not possible, ensure adequate communication between outgoing and incoming personnel; and
- Formalize and document exit interviews as agents and DEA personnel transition from foreign assignments, including a requirement to prepare transition memoranda between onboarded and offboarded agents, supervisors, and/or personnel.

**Rec. 2.5: Increase accountability of Foreign Divisions' supervisors for compliance-related performance through targeted trainings, metrics, and manager reviews.**

The DEA should consider increasing accountability for supervisors assigned overseas for compliance-related issues. As discussed above, it is essential that the DEA's leaders continue to set the tone that supervisors at all levels of the agency, including the Foreign Divisions, will be held accountable for their performance by proactively identifying and mitigating emerging compliance risks unique to the Foreign Divisions. Additional accountability can be accomplished through new trainings to empower Foreign Divisions and country office supervisors to escalate and mitigate compliance risks, as well as new processes to evaluate supervisor performance on compliance-related goals.

For example, the DEA could consider developing and implementing supervisor-level training on how to identify emerging compliance risks tailored to each Foreign Division, such as when to

escalate those risks to Headquarters, and what steps to take to mitigate emerging risks. In addition, to set the expectation that agents will be held accountable for compliance-related issues, and to encourage agents operating in the Foreign Division to escalate emerging compliance risks, the DEA could consider developing compliance-related performance metrics for supervisors.

**Rec. 2.6: The DEA should also consider leveraging technology for increased escalation and tracking of compliance-related incidents.**

The DEA could evaluate whether there are opportunities to further enhance existing processes and protocols for escalating compliance issues from Foreign Division supervisors in real time. For example, DEA could leverage technological resources to allow the relevant DEA component offices to more easily escalate new compliance risks to Headquarters. Additional technological resources can be leveraged and developed to enhance Headquarters' capabilities to track the implementation of remediation for prior compliance risks with specific timeframes set for completion.

**STRATEGIC RECOMMENDATION 3 – THE DEA SHOULD IMMEDIATELY AND REGULARLY ASSESS ITS FOREIGN FOOTPRINT TO MAXIMIZE IMPACT AGAINST CURRENT US DRUG THREATS AND THE TRANSNATIONAL ORGANIZED CRIME NETWORKS RESPONSIBLE FOR THESE THREATS.**

Overview

The DEA’s new “One DEA” approach to countering priority threats should inform the strategic allocation of the DEA’s operational and information resources across its Foreign and Domestic Divisions. To this end, the agency’s foreign footprint and its assignment of agents abroad should align with the enforcement priorities identified by DEA leadership towards the transnational organized crime networks posing the greatest threat to the health and safety of US communities. The Review Team identified two areas that present immediate opportunities for further alignment.

First, as discussed in further detail below, the DEA’s legacy “rightsizing process” for adjusting the agency’s foreign footprint was driven primarily by individual requests from within each Foreign Division rather than being driven by a holistic and strategic view tied to metrics or objectives associated with the agency’s top enforcement priorities (e.g., the current efforts against the Sinaloa and CJNG cartels). In fact, the DEA has not conducted a comprehensive and strategic assessment of its foreign footprint in the 50 years since it first stationed agents abroad. The Review Team believes there are at least two key considerations that should inform the DEA’s approach to assessing its foreign footprint:

- The work of the DEA’s new Counter Threat Teams, as well as the new agency-wide enforcement priorities, present an opportunity to re-evaluate the agency’s foreign footprint and set up processes to ensure the agency operates in the right geographies to maximize impact for the next 50 years.
- As transnational organized crime networks like the Sinaloa and CJNG cartels modernize and digitize their operations to adapt to the global economy, the DEA must adapt its overseas assignments to meet these rapidly evolving threats. The DEA should establish procedures that allow it to more quickly reassign assets as needed across and within its Foreign Divisions.

Second, the DEA should continue to enhance its analytical capabilities to assess where to assign its personnel abroad to best advance the agency’s enforcement priorities. Transnational organized crime networks like the Sinaloa and CJNG cartels are composed of highly sophisticated criminals determined to conceal their operations and evade detection and prosecution by law enforcement. To meet the violence and corruption associated with these criminal networks, the DEA must continue to invest in its data and analytic capabilities to prioritize assignment of operational resources across its Foreign Divisions. More efficient and

agile assignments are essential to disrupting the capabilities of violent cartels like the Sinaloa and CJNG and to countering the rise of future transnational organized crime networks.

## Key Takeaways

### *Areas of Strength*

- **Global Footprint.** The DEA currently has 93 offices in 69 countries across eight Foreign Divisions (Africa, Andean, Caribbean, Europe, Far East, Middle East, North and Central America, Southern Cone) covering every continent except for Antarctica. The breadth of the DEA’s foreign footprint and depth of its global expertise is vital to its ability to identify, target, disrupt, and dismantle the transnational organized crime networks responsible for evolving US drug threats.
- **Foreign Partnerships.** The DEA’s relationships with foreign law enforcement counterparts are essential to its ability to counter evolving US drug threats. A common theme from interviews was that in the vast majority of cases where the relationships worked well, there were tangible and impactful results benefitting US communities. Several interviewees described the foreign offices as highly effective at collecting information from sources abroad.<sup>80</sup>
- **Foreign Division and Program Metrics.** As discussed in more detail below, the DEA has started modernizing its data systems and has developed new metrics to allow for better oversight of DEA’s Foreign Division programs (e.g., SIU, VU, and JWIP programs).

### *Areas for Improvement*

- **Rightsizing Process for Foreign Footprint.** The DEA’s process for adjusting its foreign footprint—historically called the “rightsizing process”—has not consistently prioritized operations targeting the transnational organized crime networks posing the greatest threat to US communities. For example, “rightsizing” memos from Foreign Divisions have not consistently tied requests to increase or decrease resources or to open or close offices to enforcement-specific metrics, nor have they included detailed analyses of how resource allocations would further the DEA’s enforcement priorities. One interviewee described that historically the rightsizing process was “frustrating” and at times operating in a “vacuum” within DEA’s operational components and that the process for determining where DEA should operate abroad needs to be “threat-driven”

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<sup>80</sup> See, e.g., Interview of DEA Deputy Chief of Operations, Domestic Divisions.

requiring a “nimble prioritization process[.]”<sup>81</sup> Another interviewee described that the rightsizing process had become merely a “paperwork exercise.”<sup>82</sup>

- **Agent Assignment Processes.** A common theme from interviews across Foreign Divisions and DEA component offices was that the DEA’s international operations have been hindered by lengthy and bureaucratic processes for assigning agents to Foreign Divisions. For example, the Permanent Change of Stations (PCS) process for foreign assignments is slow and inefficient, which can compound operational issues on the ground.
- **Recruitment of Personnel to Priority Country Offices.** The DEA increasingly faces challenges attracting top talent to its Foreign Divisions and in particular to the offices that the DEA categorizes as “hard to fill.” These offices often face the most difficult and complex operational and compliance challenges but remain key to the DEA’s success against priority transnational organized crime networks.

### Recommendations

#### **Rec. 3.1: Operationalize data-driven processes and systems to immediately and regularly assess the foreign footprint based on current US drug threats and priority transnational organized crime networks, Foreign Division strategic plans, and other relevant inputs.**

The Review Team found that historical processes for setting the DEA’s foreign footprint were not always aligned with countering the current US drug threats and the priority transnational organized crime networks behind them. The DEA should consider revising the “rightsizing process” to assess and set the agency’s foreign footprint based on information and data reflecting where operational resources are needed most to counter, degrade, and dismantle the transnational organized crime networks that pose the great threat to US communities. These revised processes could be further informed by strategic assessments of core threats and the development of the Foreign Division-specific strategic plans discussed below, as well as other relevant inputs. The Review Team believes that this new assessment process of the DEA’s foreign footprint should begin immediately and be repeated at regular intervals.

For example, the DEA could consider setting its foreign footprint, including whether to open or close country offices and whether to assign or shift personnel as needed into or within Foreign Divisions, based on metrics that measure each Foreign Division’s contributions towards combatting the transnational organized crime networks posing the greatest threat to US communities. These metrics could better measure the value that each Foreign Division and its

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<sup>81</sup> Interview of Acting Chief of Intelligence.

<sup>82</sup> Interview of Deputy Chief of Operations, Foreign Divisions.

respective country offices bring to the broader US mission as well as more rigorously assess the challenges of operating in particular regions and countries. These metrics, in turn, could inform the DEA's allocation of resources to ensure that the country offices operate effectively in advancing the agency's enforcement priorities, while also ensuring compliance with applicable laws, regulations, and rules. Finally, these metrics could identify material issues for the DEA to discuss with its host nation law enforcement counterparts to improve relationships and productivity going forward.

Further, the enhanced foreign footprint setting process should align with and be informed by each Foreign Division's strategic plan. This would ensure that leadership and supervisors within the Foreign Divisions and Headquarters are focused on prioritizing resources to those country offices and Foreign Divisions that are positioned to have the great impact on the agency's top enforcement priorities.

**Rec. 3.2: DEA leadership should reassess its foreign footprint regularly by conducting and reviewing its foreign footprint at an established cadence.**

The DEA could consider establishing regular intervals for reevaluating its foreign footprint and operations. For example, the foreign footprint assessment could be conducted with a multi-year time horizon with annual reviews to adjust resource assignments based on the latest drug threat analyses and enforcement priorities. The Review Team believes that it is important that the DEA's decisions about its foreign footprint are informed by long-term strategic planning to pursue the agency's enforcement priorities and ensuring the agency remains well-positioned to reallocate resources efficiently as US drug threats evolve.

**Rec. 3.3: Streamline PCS assignment process and create additional incentives related to hard-to-fill country offices.**

The Review Team observed that (1) the DEA's foreign assignment process can be inefficient and that (2) at times it can be difficult to recruit talented agents to hard-to-fill offices abroad. The DEA could increase support for the agency's onboarding and offboarding processes for the Foreign Divisions, including through the use of technology, to facilitate and streamline the required training, vetting, and onboarding and offboarding processes for DEA personnel going and returning from overseas assignments.

Further, the DEA could consider putting in place incentives to attract top talent to hard-to-fill offices. These incentives could include allowing agents who serve in hard-to-fill offices to be eligible for promotions earlier or even in place or offering priority placement for their next post. Incentives could also include establishing additional commendations or awards that could advance promotion based on accomplishments while assigned to Foreign Divisions. As part of this process, DEA could consider educating agents early in their careers about the opportunities of Foreign Division assignments. For example, the DEA could provide recruits

training/information about the benefits, rewards, and challenges of Foreign Division work as part of the core Academy training.

**Rec. 3.4: The DEA should consider comprehensively identifying and addressing inefficiencies in its Foreign Division assignment process, including a review of the relevant component units involved in assignment logistics, such as the DEA’s Human Resources and Financial Management Divisions.**

The DEA should consider conducting a review of the Foreign Administrative Support Unit, Human Resources Division, and the Financial Management Division to identify inefficiencies and streamline personnel assignment processes. This review could also seek to identify root causes for inefficiencies and potential enhancements, primarily to streamline the PCS process itself. This review would enable the agency to better respond to evolving US drug threats as they emerge globally and would lead to more efficient and effective personnel assignment processes across the Foreign Divisions.

**Rec. 3.5: Establish pool of agents and staff across Domestic and Foreign Divisions available for short-term assignments to mission critical country offices.**

To remain nimble in countering evolving US drug threats, the DEA should consider strengthening its ability to launch short-term assignments in priority country offices across the Foreign Divisions. To do so, the DEA should consider establishing pools of agents and personnel across the Domestic and Foreign Divisions who are available for short-term assignment to mission critical country offices, as well as strengthening interagency partnerships to leverage additional personnel from other federal agencies for assignment abroad. The DEA should also consider moving resources between offices within the same Foreign Division as needed to meet evolving threats.

For example, the DEA could consider establishing “reserve” teams across Domestic and Foreign Divisions available for short term-assignments to mission critical country offices to meet new and/or evolving threats from the agency’s priority enforcement targets (e.g., the Sinaloa and CJNG cartels). As part of this process, DEA could consider recruiting high-performing staff to be part of reserve teams available to be assigned to Foreign Divisions on a short-term basis. For example, these processes could include creating channels for supervisors across the agency’s Domestic Divisions to recommend agents and personnel for potential recruitment into teams available for short-term assignments to Foreign Divisions.

The DEA could also consider developing enhanced training, pre-assignment, post-assignment, and other compliance controls for these “reserve” teams to ensure team members have the key skills they need to operate successfully during their short-term assignments in Foreign Divisions. This training could be tailored to the unique compliance risks of operating overseas in challenging environments. Training and onboarding processes for these reserve teams could also



provide the key background knowledge and context needed to successfully accomplish the mission of the short-term assignments.

#### IV. CONCLUSION

For the past 50 years, the DEA has operated effectively overseas to advance its mission of protecting the health and safety of American communities against the dangerous drug threats posed by transnational organized crime networks. To accomplish its mission over the next 50 years, the DEA must continue to operate in high-risk environments, including countries with significant corruption and rule of law challenges. The Review Team believes that the above recommendations are immediate and important ways in which the DEA can continue to modernize the agency's approach to its international operations to maximize its impact against US drug threats and related violence while also ensuring compliance with applicable laws, rules, and regulations.

The DEA's leadership over the past year has made meaningful progress towards instituting new policies, systems, training, and governance to align the DEA's Foreign and Domestic Divisions around a "One DEA" approach to counter US drug threats. As part of this effort, the DEA's leadership also have made important strides towards remediating past compliance risks associated with its foreign operations to help ensure that the agency remains prepared to effectively respond to future and evolving compliance risks overseas. The DEA must continue to build on this progress and implement modern oversight and systems to proactively detect compliance risks as they emerge overseas. Finally, DEA leadership should also continue to assess ways to ensure that the agency's foreign footprint aligns with DEA enforcement priorities, as well as addressing inefficiencies in the personnel assignment process to ensure that the agency's best talent can be nimbly and effectively assigned abroad to address emerging threats to US communities and US interests with the training and information they need to succeed.