



2023 WHITE HOUSE STRATEGY TO COMBAT TRANSNATIONAL ORGANIZED CRIME

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Table of Contents

I. Executive Summary.....	3
II. Strategic Environment.....	4
III. The U.S. Approach	6
IV. Strategic Pillars.....	7
Pillar One: Enhance Intelligence and Information Sharing	7
Pillar Two: Strengthen Interdictions, Investigations, and Prosecutions	8
Pillar Three: Target Transnational Organized Crime Enablers	9
Pillar Four: Build International Capacity, Cooperation, and Partnerships	10
V. The Way Forward	12
VI. Appendix: Strategic Objectives to Counter Transnational Organized Crime	13
Pillar One: Enhance Intelligence and Information Sharing	13
Strategic Objective 1.1: Prioritize the transnational organized crime issues and actors that pose the greatest threat to national security	13
Strategic Objective 1.2: Enrich our existing tools for sharing intelligence and information and create new ones	13
Strategic Objective 1.3: Foster a culture of sharing.....	14
Strategic Objective 1.4: Increase our engagement with non-traditional and external partners, including the private sector	15
Pillar Two: Strengthen Interdictions, Investigations, and Prosecutions	16
Strategic Objective 2.1: Improve our understanding of our current posture	16
Strategic Objective 2.2: Explore new sources of data	16
Strategic Objective 2.3: Enhance our ability to target and prosecute transnational organized crime actors	17
Strategic Objective 2.4: Increase our foreign law enforcement partnerships	18
Pillar Three: Attack Transnational Organized Crime Enablers	19
Strategic Objective 3.1: Increase identification and targeting of facilitators.....	19
Strategic Objective 3.2: Disrupt illicit finance pathway.....	20
Strategic Objective 3.3: Develop new approaches to counter transnational organized crime cyber capabilities	20
Pillar Four: Build International Capacity, Cooperation, and Partnerships	22



Strategic Objective 4.1: Convey consistent messages and priorities regarding transnational organized crime 22

Strategic Objective 4.2: Use information-sharing tools and coordinate actions..... 23

Strategic Objective 4.3: Build the capacity of our foreign partners to counter transnational organized crime 23

Strategic Objective 4.4: Engage in closer collaboration with FVEY partners on transnational organized crime 24

Strategic Objective 4.5: Increase our involvement in formal and informal multilateral fora 24



I. Executive Summary

Transnational Organized Crime is a growing national security threat to the United States and our foreign partners that is increasingly sophisticated, more fluid in its structures, and deadlier to U.S. citizens. This strategy seeks to build, balance, and integrate the tools of American power to combat transnational organized crime and related threats to national security—and to urge our partners to do the same. The goal of the strategy is to degrade the ability of transnational organized crime to harm U.S. citizens, businesses, and government and to protect our security, prosperity, and the rule of law. To achieve this goal, the U.S. Government needs to be more strategic and integrated in its approach, unifying efforts across the numerous departments and agencies focused on combatting transnational organized crime. The strategy directs the Federal enterprise to fully employ the various tools and capabilities already at its disposal and explore new opportunities to tackle this evolving challenge from all angles. While this strategy makes no explicit assumptions about budgetary increases, additional resources will be necessary to contend with the growing threat and ensure agencies are using all available tools to maximum effect.

Transnational criminal organizations (TCOs) refer to groups, networks, and associated individuals who operate transnationally for the purpose of obtaining power, influence, or monetary or commercial gain, wholly or in part by illegal means, while advancing their activities through a pattern of crime, corruption, or violence, and while protecting their illegal activities through a transnational organizational structure and the exploitation of public corruption or transnational logistics, financial, or communication mechanisms.

TCOs are opportunistic and maintain their involvement in traditional organized crime while continuing to explore new ventures to raise revenue. TCOs engage in a wide variety of crimes, including drug, arms, and wildlife trafficking, human smuggling and trafficking, fraud, theft, violent crime (e.g., murder, kidnapping, and extortion), money laundering, environmental crime, and illegal gambling. New sectors of economic activity present opportunities for TCOs.

TCOs are increasingly fluid in their structures, preferring to rely on the expertise of outside facilitators to carry out key functions of their operations, such as money laundering. This fluidity makes them more agile and resilient to previous lines of effort that prioritized targeting TCO leadership. They are increasingly polycriminal, ensuring multiple sources of revenue if disruptions occur in one area of their operations. They can range in size from a few individuals to a complex network of networks. Some, such as criminally-linked business elites, straddle the licit and illicit worlds. In addition to outside facilitators, TCOs rely on corruption and cyber tools to enable their criminal activities.



II. Strategic Environment

The strategic environment for combatting transnational organized crime has shifted significantly over the past decade, requiring the United States Government to update its approach and outline a framework for an effective whole-of-government response to tackle this evolving challenge. This strategy updates the *2011 White House Strategy to Combat Transnational Organized Crime*, reflecting and responding to the shifting strategic environment, while still advancing the objectives set out in the *2011 TOC Strategy*. It also aligns with the *2022 National Security Strategy*, the *2023 National Cybersecurity Strategy*, the *2022 National Drug Control Strategy*, and the *2021 United States Strategy on Countering Corruption*.

TCOs increasingly smuggle synthetic drugs, which can be produced anywhere. Synthetic opioids are incredibly potent, meaning TCOs can derive large profits from even small amounts smuggled into the United States and other nations around the world. More than 110,000 people in the United States overdosed within a 12-month period ending in March 2023; nearly 70% of which involved synthetic opioids, like fentanyl, and over 30% involved synthetic stimulants, like methamphetamine. The proliferation of fentanyl and other illicit synthetic drugs represent a threat to our national security as well as a public health crisis.

TCOs increasingly participate in mutually beneficial relationships with foreign government officials, who enable them to carry out their operations. Corruption of public officials allows TCOs to operate in certain areas with impunity, fueling violence, destabilizing the rule of law, eroding confidence in public institutions, and weakening democratic governance. Some authoritarian governments weaponize TCOs to carry out activities that benefit the state, such as evading sanctions and suppressing internal protests. The global trend of weakening democratic institutions creates opportunities for TCOs, because strong democracies are more resilient to criminal exploitation of law enforcement and criminal justice systems. The characteristics of TCOs present numerous options to states such as Russia, China, Iran, and North Korea to achieve their goals, including destabilizing U.S. partners and allies, securing access to natural resources, and evading sanctions levied by the international community.

Technological advances such as the evolution of cyberspace provide TCOs with a wealth of opportunities to provide illicit goods and target victims with ransomware attacks and fraud schemes without crossing any physical borders. The increasing popularity of digital assets like cryptocurrency in the economy provide new avenues to finance operations, as well as move and launder proceeds of crime. The widespread availability of encryption has made it more difficult and, in some cases, impossible for law enforcement to access criminal communications.

TCOs increasingly engage in environmental crimes, such as illegal mining, wildlife and timber trafficking, and illegal unreported, and unregulated fishing. These crimes have far-reaching impacts that cause financial harm, endanger public health, and contribute to biodiversity loss and climate change.

The COVID-19 pandemic provided TCOs with new opportunities to raise revenue. In the short term, TCOs benefitted by submitting fraudulent claims to government relief programs and profiteering from shortages in supply chains. As many countries struggle to emerge from the longer-term economic impacts of the pandemic, such as inflation and economic stagnation,



TCOs may use dismal employment opportunities to recruit new members and corrupt additional public officials seeking to supplement their incomes.

As a growing number of people migrate to flee instability and in search of better economic opportunities, TCOs increasingly profit by running human smuggling operations. TCO-related violence in some developing countries also drives migration. The expected rise in climate driven migration over the coming decades will increase opportunities for TCOs to profit in this area.



III. The U.S. Approach

The goal of this strategy is to degrade the ability of transnational criminal organizations to harm U.S. citizens, businesses, and government to protect U.S. national security, prosperity, and the rule of law. To do this, the U.S. Government will build, balance, and integrate the tools of American power to combat transnational organized crime and related threats to national security—and to urge U.S. partners to do the same. The U.S. Government’s counter-transnational organized crime enterprise is wide-ranging, with a large number of departments and agencies responsible for covering different aspects of the transnational organized crime threat. In addition, both the intelligence and law enforcement communities work to counter this threat, each with different goals pertaining to disruption and prosecution. The Administration will work with Members of Congress to pass legislation to give departments and agencies additional authorities and tools to counter transnational organized crime as needed. We will leverage the full force of the U.S. Government by making unprecedented efforts to share information and intelligence across departments and agencies, including working with non-traditional partners to combat transnational organized crime. This collaboration will allow for a common understanding of the threat and enhance our situational awareness, enabling us to prioritize the most significant targets and leverage resources. We will be forward-leaning, anticipating and detecting new trends and working together across the U.S. Government to provide a more rapid response to these changes. We will target enablers of transnational organized crime, making it systemically difficult for TCOs to operate efficiently and effectively. We will work with foreign partners on this shared challenge, cooperating and sharing our knowledge and resources to counter transnational organized crime and fostering environments more resilient to the destructive power of transnational organized crime. We will identify TCOs who work to advance the interests of malign state actors and deprive them of their ability to carry out activities that harm U.S. interests and those of our close partners.

The Interagency Policy Committee (IPC) on Transnational Organized Crime will oversee a whole-of-government approach to implementing this strategy, engaging with all relevant departments and agencies as well as counter-transnational organized crime entities like the United States Council on Transnational Organized Crime (USCTOC). The National Security Council Staff will use the IPC to issue implementation guidance, establish performance metrics, and receive regular progress updates from the interagency community. This IPC will be informed by and work with other relevant IPCs. With a new *Strategy to Combat Transnational Organized Crime* and an array of new authorities and tools, this Administration is committing to ensure that we rise to the national security challenges of the 21st century and advance an international order that protects the safety and well-being of our citizens.



IV. Strategic Pillars

Enhance Intelligence and Information Sharing

Strengthen Interdictions, Investigations, and Prosecutions

Target Transnational Organized Crime Enablers

Build International Capacity, Cooperation, and Partnerships

Pillar One: Enhance Intelligence and Information Sharing

Transnational organized crime is unique as a national security threat in that so much of the information is gathered by law enforcement at the unclassified level. In addition, the need to protect intelligence sources and methods can make it difficult to share information collected and analyzed by the intelligence community with law enforcement officers and prosecutors. The large number of departments and agencies with a transnational organized crime mission increases the possibility that intelligence and information do not get shared with all appropriate partners (such as border security, immigration and visa services, regulatory and credentialing agencies, private sector, and civil society organizations), or does not bridge the divide between law enforcement and the intelligence community. Information and intelligence need to flow more freely, consistent with all appropriate legal authorities. Unclassified information should move from law enforcement and the private sector to the Intelligence Community. Classified information (through tearlines and declassification) should be shared with law enforcement, policy makers, and the private sector. To make effective policy and take decisive action, we need to better understand how transnational criminal organizations operate at a strategic, global level. More sharing is needed at the strategic level, to ensure the U.S. Government is anticipating rather than reacting to threats. Harmonizing our efforts and sharing the information we have on significant targets, facilitators, and other key figures will lead to more TCO disruptions. As globalization has accelerated, TCOs have been increasingly able to hide their illicit goods and money movements within an ever-growing amount of licit commerce. We will leverage advances in data analytics, artificial intelligence, and machine learning to identify transnational organized crime networks and actors, while protecting the civil liberties of American citizens. Additionally, increasing our engagement with the private sector, including the banking, chemical, and tech industries, as well as non-governmental organizations, think tanks and research institutes, could assist in illuminating transnational organized crime trends and patterns.

To make progress on enhancing intelligence and information sharing, we will **prioritize transnational organized crime issues and actors that pose the greatest threat to national security** (Strategic Objective 1.1), ensuring that we are unified in our efforts and our resources are positioned to have the greatest impact. We will **enrich our existing tools for sharing intelligence and information and create new ones** (Strategic Objective 1.2), sharing classified and unclassified information on platforms with appropriate access controls to create a common understanding of the threat. We will **foster a culture of sharing** (Strategic Objective 1.3), ensuring that sharing transnational organized crime intelligence and information within the U.S. Government and with trusted partners is the rule not the exception. Finally, we will **increase our**



engagement with non-traditional and external partners, including the private sector (Strategic Objective 1.4), improving their understanding of the transnational organized crime threat and potentially expanding our ability to collect information from multiple sources.

LOEs that will advance these strategic objectives include:

- Enhance U.S. collection and analysis of intelligence and law enforcement information on transnational organized crime entities that pose the greatest threat to national security.
- Establish a training program for Intelligence Community and law enforcement personnel to foster a culture of sharing and an understanding of how to safely share transnational organized crime intelligence and information across communities.
- Enhance voluntary public/private partnership programs to strengthen supply chains and enhance border security.

Pillar Two: Strengthen Interdictions, Investigations, and Prosecutions

We have made great strides in the sharing of tactical and operational information to support specific, significant investigations, but we can do more. Some of these successes were spearheaded by the work of various task forces and fusion centers that co-locate people, skills, authorities, and data from stakeholder agencies for specific portions of the transnational organized crime mission. Task forces and fusion centers that undertake complex investigations and prosecutions nationally and internationally exemplify the work that needs to be done to counter sophisticated TCOs. Visa restrictions and economic sanctions can assist with disrupting foreign transnational organized crime actors and facilitators, denying them and in some cases their families' access to the United States or to their funds or other assets in the United States. Additionally, the prospect of visa restrictions or sanctions can be a powerful incentive for criminals to cooperate with authorities, as has been demonstrated by individuals subject to counternarcotics sanctions. Capacity building among our willing international partners is essential to countering transnational organized crime, enabling them to disrupt TCOs in their own countries through successful investigations and prosecutions without relying on the U.S. criminal justice system, as well as teaching partners how to work effectively with U.S. criminal justice authorities. Vetted units of foreign law enforcement can follow up on U.S. leads and conduct interdictions, investigative operations, surveillance, and lawful wiretaps.

To achieve results, we will **improve our understanding of our current posture**, (Strategic Objective 2.1), enabling us to better chart our progress in combatting transnational organized crime. We will **explore new sources of data** (Strategic Objective 2.2), giving investigators additional and better leads to increase their effectiveness. We will **enhance our ability to target and prosecute transnational organized crime actors** (Strategic Objective 2.3), coordinating and deconflicting across departments and agencies and working with Members of Congress where additional legislation is required. Where we see strong political will, we will **expand our foreign law enforcement partnerships and their effectiveness** (Strategic Objective 2.4), building partner capacity and embedding U.S. personnel with foreign law enforcement to combat transnational organized crime overseas.



LOEs that will advance these strategic objectives include:

- Effectively coordinate visa restrictions and economic sanctions to deny foreign transnational organized crime actors and their families' access to the United States and its financial system.
- Increase the number and effectiveness of U.S. Government personnel embedded with foreign police and intelligence services in countries with a significant transnational organized crime nexus to the United States.
- Increase data flow from the Intelligence Community to law enforcement fusion centers, and increase training of personnel at these fusion centers on strategies and techniques, including deconfliction, to disseminate tips and leads from said intelligence.

Pillar Three: Target Transnational Organized Crime Enablers

Disrupting individual TCOs typically does not have a lasting effect, as others quickly step in to provide illicit goods and services to fill the void. To produce a sustained significant impact, we also need to prioritize targeting the enablers of transnational organized crime—the people, tools, and methods that provide TCOs with the capabilities to carry out their operations. As TCOs become less structured and more sophisticated, they increasingly depend on facilitators or gatekeepers outside of their groups to enable aspects of their illegal enterprise. Identifying and disrupting key facilitators or facilitation networks—those enabling the work of multiple TCOs—is essential to countering the transnational organized crime threat.

The capability to move and launder illicit proceeds is critical to transnational organized crime success. The widespread use of the U.S. financial system provides opportunities to block (or freeze), or where appropriate, to seize and forfeit assets. We need to expand our work with our international partners to identify safe havens abroad that TCOs use to hide funds from U.S. investigators, regulators, and intelligence components, and to disrupt related financial flows. Even as TCOs continue to rely on traditional methods of money laundering, such as trade-based money laundering, real estate, and bulk cash smuggling, TCOs launder illicit proceeds in a variety of new ways as well, such as through online gambling and vulnerabilities in the digital assets sector.

Technological innovation provides other enablers for TCOs. TCOs use phishing techniques and deploy malware to target U.S. businesses, including ransomware attacks and high-value business email compromise schemes. TCOs also target U.S. citizens with a variety of cyber fraud schemes. Encryption in the form of apps and hardened secure devices provide TCOs with secure means of communication.

Corruption of U.S. and foreign public officials also continues to enable TCOs. TCOs bribe government officials to shield their enterprises from government interference. In fragile states, TCOs can benefit from corruption to operate with impunity, fueling instability and undermining democracy. Criminally-linked business elites can be used by kleptocrats and other state actors to advance national policy aims.



To make progress against transnational organized crime enablers, we will **increase the identification and targeting of facilitators** (Strategic Objective 3.1), inhibiting their ability to assist TCOs. We will **disrupt illicit finance pathways** (Strategic Objective 3.2), dedicating increased resources, effectively using and sharing financial reporting, and expanding our aperture to include virtual currency and new ways of laundering illicit proceeds. We will **develop new approaches to counter transnational organized crime cyber** capabilities (Strategic Objective 3.3), ensuring we are keeping pace with TCO innovation and developing work arounds for encrypted communications.

LOEs that will advance these strategic objectives include:

- Continue to identify foreign kleptocrats and senior government officials engaged in criminal conduct with TCOs, including corruption, and target their assets for freezing, seizure, forfeiture, or where appropriate, repatriation to the people of the country harmed by the corruption.
- Expand sharing as appropriate of strategic financial information with foreign financial intelligence units and other foreign government partners to increase mutual knowledge, on financial trends and shifts in the funding of TCOs' activities.
- Increase engagement with the private sector to craft educational messaging for the public to counter cyber fraud schemes and ransomware attacks.

Pillar Four: Build International Capacity, Cooperation, and Partnerships

Transnational organized crime's global presence means that cooperation with foreign partners is critical to countering this shared threat to benefit all partners' security, governance, and prosperity. Capacity building among our international partners empowers them to disrupt TCOs in their own country without relying on the U.S. justice system and to cooperate more effectively with U.S. criminal justice officials. Transnational organized crime-related capacity building, such as training and mentorship programs for foreign law enforcement partners, builds good will and increases their effectiveness in countering TCOs. New joint initiatives, when undertaken, should include metrics for success and that are assessed and discussed routinely during the life of the initiative to ensure they continue to contribute effectively to countering transnational organized crime.

As transnational organized crime evolves, we need to be mindful that current partnerships may also need to change and evolve; we will need to leverage relationships with different countries to make progress. When possible, we should engage with like-minded partners to build capacity in other countries, leveraging their resources for a more significant impact. We have made great strides in advancing our cooperation with Five Eyes (FVEY) partners through the Five Eyes Law Enforcement Group (FELEG), Border Five (B5), and Migration Five (M5) on specific investigations. This partnership can be expanded to include closer cooperation on transnational organized crime collection and finished intelligence products. We will increase our engagement in multilateral fora to work on transnational organized crime-related issues, such as corruption,



illicit finance, cybercrime, environmental crime, and drug trafficking, as working multilaterally can often compel more action than bilateral engagements.

To achieve results, we **will convey consistent messages and priorities regarding transnational organized crime** (Strategic Objective 4.1), ensuring our foreign partners understand the importance of transnational organized crime as a national security issue and our priorities regarding it. We will **use information-sharing tools and coordinate actions** (Strategic Objective 4.2), increasing our impact against TCOs. We will continue to **build the capacity of our foreign partners to counter transnational organized crime** (Strategic Objective 4.3), partnering through training and joint projects to disrupt TCOs overseas. We will **engage in closer collaboration with FVEY partners on transnational organized crime** (Strategic Objective 4.4), better leveraging our respective collection capabilities and partnering on and sharing more strategic intelligence. We will **increase our involvement in formal and informal multilateral fora** (Strategic Objective 4.5), to increase cooperation, develop initiatives, and secure political commitments.

LOEs that will advance these strategic objectives include:

- Bolster engagement with allies and partners to focus on key gatekeepers and facilitators and disrupting the ways in which corrupt actors move money.
- Increase U.S. use of international information sharing systems such as border data systems and encourage key foreign partners to do the same.
- Provide transnational organized crime-related capacity building to foreign partner justice sector entities.



V. The Way Forward

Transnational organized crime increasingly harms the United States and our closest partners in a variety of ways, from numbers of lives lost to drug overdoses, to economic damage inflicted on people and businesses, to advancing the interests of malign state actors. We can counter this global threat by being more strategic and coordinated in our approach, unifying our efforts across the numerous departments and agencies focused on combatting transnational organized crime, and engaging with our partners. The strategy directs the U.S. Government to fully employ the various tools and capabilities already at our disposal and explore new opportunities to tackle this evolving challenge from all angles.

The U.S. Government has already begun to implement actions under each of this Strategy's Strategic Objectives. To hold ourselves accountable, the National Security Council will develop an implementation plan in coordination with Federal departments and agencies to chart the progress made against the Strategy's goals. By elevating our efforts, coordinating with partners, and learning as we move forward, together we will counter these criminal organizations that impact so many people around the world.



VI. Appendix: Strategic Objectives to Counter Transnational Organized Crime

Pillar One: Enhance Intelligence and Information Sharing

Strategic Objective 1.1: Prioritize the transnational organized crime issues and actors that pose the greatest threat to national security

- Increase U.S. collection and analysis of U.S. intelligence and law enforcement information on transnational organized crime entities that pose the greatest threat to national security, as informed by the President’s Intelligence Priorities, the National Intelligence Priority Framework (NIPF), and the U.S. Council on Transnational Organized Crime’s prioritization process, as mandated by E.O. 14060.
- Ensure the NIPF aligns with current transnational organized crime trends to enable appropriate Intelligence Community collection on transnational organized crime.
- Support and make better use of analysis conducted by external partners, including academia, the private sector, civil society, and media to understand the complete picture.

Strategic Objective 1.2: Enrich our existing tools for sharing intelligence and information and create new ones

- Increase participation in the Transnational Organized Crime Actor Detection Program (TADP). Participating departments and agencies should deliberate increasing nominations by moving from voluntary to mandatory participation and by allowing classified nominations from the Intelligence Community. Undertake an assessment of risks and benefits of including U.S. persons in the TADP. This underutilized tool allows us to detect movements of transnational organized crime actors and gathers new intelligence with every encounter. Expanded use of this tool would grow our understanding of transnational organized crime and the actors in the data set.
- Complete the creation of a transnational organized crime knowledge base on a platform available to the counter-transnational organized crime community and composed of intelligence and information on the most significant transnational organized crime actors, thus implementing National Security Presidential Memorandum (NSPM) 7. Implement measures to ensure knowledge base information benefits Intelligence Community and law enforcement investigative agencies. A common knowledge-base will enhance the United States Government's ability to effectively analyze, evaluate, integrate, correlate, and share classified national security information and other information concerning threat actors and their networks, and then use that information to support a broad array of national security missions and activities.



- Establish standardized mechanisms with Canada and other countries, as appropriate, for sharing information on drug production, trafficking, and use trends to better understand and counter these threats, especially with regard to fentanyl and other synthetic opioids.

Transnational Organized Crime Actor Detection Program (TADP)

The Transnational Organized Crime Actor Detection Program (TADP) is a whole-of-government counter-transnational organized crime information sharing and operational response enterprise. Managed by the Terrorist Screening Center (TSC), a multi-agency center administered by the FBI, the TADP is a counter-transnational organized crime modification of the TSC's advanced data management, information sharing, and operational coordination and response processes. The TADP denies transnational organized crime actors' anonymity by sharing transnational organized crime actor identity information across the U.S. Government and detecting transnational organized crime actor global travel and activities. Using these detections, the TADP provides participants real-time transnational organized crime actor travel and activity tips. These real-time tips provide law enforcement, intelligence, and participants previously unavailable opportunities to further investigations, push out the borders of the United States, map threat networks, and drive the intelligence cycle. Since its inception in March of 2016, the TADP has shared tens of thousands of transnational organized crime actor identities and detections with its participants.

Strategic Objective 1.3: Foster a culture of sharing

- Pilot a training program for Intelligence Community and law enforcement personnel to foster a culture of sharing and an understanding of how to safely share transnational organized crime intelligence and information across communities without compromising judicial processes. Train personnel on how to safely share information without compromising sources or methods and without bringing sensitive national security information into investigations.
- Develop and foster stronger law enforcement and Intelligence Community relationships among Federal, state, local, tribal, and territorial authorities, as well as private sector. Strengthening these relationships, including at working levels, will allow for a deeper understanding of the national and global threat posed by transnational organized crime by those law enforcement entities most likely to encounter TCO activities, leading to better collection and increasing our ability to detect trends as they emerge.
- Establish an interagency transnational organized crime intelligence working group composed of Title 50 and non-Title 50 representatives to regularly share all-source strategic analysis and produce finished intelligence products for policymakers.
- Increase the Intelligence Community's use of tearlines and declassification of intelligence as a matter of routine practice, not only upon request (in accordance with Intelligence Community Directives). Encourage production of intelligence products or versions of products that can be shared with law enforcement and private sector partners to boost



their understanding of the transnational organized crime threat and generate additional unclassified information.

- Increase the number of NIP-funded reports officers co-located within the law enforcement community to serialize law enforcement reports that can answer transnational organized crime-related intelligence requirements. Most of the reporting on transnational organized crime exists at the unclassified level and sharing it more broadly will ensure a more complete picture of transnational organized crime.

Strategic Objective 1.4: Increase our engagement with non-traditional and external partners, including the private sector

- Increase engagement with U.S. Government partners outside of the traditional counter-transnational organized crime community. To gain insight into activities like environmental crime, we need to ensure we are engaging with departments and agencies best positioned to counter new transnational organized crime trends. We also need to ensure we are fully engaged with non-transnational organized crime elements within existing departments and agencies, such as cyber components, to make sure gaps and seams are fully addressed and capabilities are fully leveraged.
- Undertake a study of gaps in our understanding of transnational organized crime that might be filled by private sector sources of information, including what databases should be pursued.
- Increase sharing of transnational organized crime information with the private sector, building on existing programs within departments and agencies (e.g., InfraGard, DHS Corporate Security Symposiums). Encourage private sector partners to increase transparency in reporting incidents to law enforcement, giving the U.S. Government better insight into transnational organized crime trends as they emerge.
- Increase engagement with foreign industry partners, particularly with industries most relevant to disrupting transnational organized crime activities, such as shipping.
- Pilot a voluntary public/private partnership program to strengthen supply chains and enhance border security, similar to the Customs Trade Partnership Against Terrorism (CTPAT) and CBP's Section 321 Pilot Program. This program would enable a closer working relationship between the private sector and the U.S. Government on transnational organized crime and assist partners in identifying their own security vulnerabilities.



United States Council on Transnational Organized Crime (USCTOC)

Executive Order 14060 established the United States Council on Transnational Organized Crime (USCTOC) on December 15, 2021, bringing together six key departments and agencies involved in counter-transnational organized crime efforts to ensure that the U.S. Government effectively leverages all appropriate tools to counter the threats posed by transnational criminal organizations. USCTOC includes Cabinet-level representation from the Department of Justice, the Department of Homeland Security, the Department of the Treasury, the Department of State, the Department of Defense, and the Office of the Director of National Intelligence. The Strategic Division, the operational arm of the USCTOC, is charged with developing whole-of-government plans to address the top transnational organized crime threats. The Strategic Division draws on law enforcement and Intelligence Community information to develop comprehensive strategic plans to drive operations, initiatives, and actions across the government. This integrated approach is especially critical in today's operating environment, where transnational criminal organizations have become more geographically diverse and organizationally diffuse, utilizing a wide range of illicit means to accomplish their goals.

Pillar Two: Strengthen Interdictions, Investigations, and Prosecutions

Strategic Objective 2.1: Improve our understanding of our current posture

- Establish a yearly report process for evaluating our progress against the most significant transnational organized crime threats. Establish metrics for information and intelligence collection, analysis, reporting, with the goal of evaluating progress toward established goals and supporting significant arrests and prosecutions.
- Create a map and graphic of all domestic and international federal task forces dedicated to the most significant transnational organized crime threats. The product should include participants, the mission, and descriptions of how information is shared and drives investigations. This product would enhance U.S. Government-wide understanding of available resources and help detect duplication of effort.
- U.S. law enforcement should leverage deconfliction tools and procedures to ensure greater cooperation and coordination of U.S. foreign criminal investigations and prosecutions.

Strategic Objective 2.2: Explore new sources of data

- Create a pilot for enhancing the sharing of data among fusion centers. Although fusion centers have been largely effective in executing their missions, more could be done to leverage the information they collect to further interdictions, investigations, and prosecutions.
- Establish a pilot to answer key intelligence questions using information contained in databases used by the Organized Crime Drug Enforcement Task Force (OCDETF)



Fusion Center (OFC) and those databases maintained by components of the intelligence community, consistent with applicable legal limitations and memoranda of understanding governing how information contained in these databases is shared. Sharing intelligence community information and investigative information will generate new strategic products, possible investigative leads (using appropriate legal guidelines), and result in more TCO disruptions. Where feasible, the pilot should identify any legislative amendments that may be necessary to achieve greater data integration across law enforcement and Intelligence Community holdings.

- Explore ways to make materials obtained during seizures quickly and lawfully available to intelligence channels for further exploitation and analysis. Materials such as cell phone data, biometrics, pocket litter, media, weapon serial numbers, and documents are typically deemed to be evidentiary information that requires departments and agencies approval in advance of releasing to the Intelligence Community, which significantly undermines the value of this information for intelligence purposes.
- Establish an interagency working group of transnational organized crime and technical experts to explore big data solutions at an unclassified level to counter transnational organized crime. This effort would ensure that data gained through investigations and engagement with the private sector are fully exploited to counter transnational organized crime.

Strategic Objective 2.3: Enhance our ability to target and prosecute transnational organized crime actors

- Secure the U.S. Visa Issuance system with appropriate mechanisms to reduce transnational organized crime travel into the United States, preventing easy access to U.S. targets. Coordinate this effort with the interagency to ensure deconfliction with ongoing investigations.
- Increase the use of rewards programs, coordinated visa restrictions, and economic sanctions to identify and locate foreign transnational organized crime actors and deny them and, in some cases, their families' access to the United States—and particularly to the U.S. financial system. Publicize rewards and coordinate the cadence of actions across departments and agencies against foreign transnational organized crime actors to ensure maximum impact. Denying direct access to the United States and its financial system would inhibit TCOs' ability to conduct criminal operations, to include money laundering.
- Streamline processes for administrative oversight for the issuance of S visas to assist the United States with its criminal investigations and prosecutions.
- Seek legislation to better align penalties with current transnational organized crime activities and ensure they are commensurate with their impact on U.S. citizens, including seeking legislation to increase the maximum penalties for facilitating the manufacture of fentanyl or counterfeit substances containing fentanyl, and to reduce TCOs' exploitation of *de minimis* and consolidated shipments to ship chemicals and pharmaceuticals for illicit use.



Strategic Objective 2.4: Increase our foreign law enforcement partnerships

- Strengthen cooperation with international police organizations, such as Europol, Ameripol, Interpol, and the International Association of Chiefs of Police (IACP), to facilitate expeditious cross-border police cooperation. TCOs are largely unhampered by bureaucracy and can move themselves, people, and illicit goods quickly across borders. We need to mirror their speed and efficiency, which can be facilitated by building these law enforcement partnerships.
- Strengthen the capacity of international partners to carry out interdictions, investigations, enforcement of anti-money laundering standards and prosecutions, offering the most help to willing partners where improvements likely will have the biggest impact on the United States. Increasing partner capacity will enable them to disrupt TCOs in their own countries without relying on the U.S. justice system and provide partners with required skills to support investigations in the United States that have a foreign nexus.
- Increase the number of U.S. Government personnel embedded with foreign police and intelligence services in countries with a significant transnational organized crime nexus to the United States. Ensure the embedded personnel are engaging and working strategically with other U.S. counterparts operating in-country. Personnel in country build trust with foreign partners and can help facilitate a rapid response against TCOs at crucial moments.
- Continue to create vetted units with willing partners in foreign countries with a significant transnational organized crime nexus to the United States. Vetted units, to include those covering border security, undertake operations that support the U.S.'s counter-transnational organized crime mission, ensure the safety of U.S. personnel in country, and reduce the risk of sensitive information being compromised.



Technological Advances Embraced by TCOs Require Innovative Law Enforcement Responses

The ease of use and availability of advanced technology has fundamentally changed the way criminal groups operate, making TCOs a truly global and advanced threat. TCOs are increasingly using advanced technologies, allowing them to obfuscate their identity and activity, increase their transnational reach, increase criminal proceeds, diversify their criminal activity, and exploit limitations of law enforcement. U.S. law enforcement is responding with collaborative, innovative approaches to counter this threat.

- In **Operation Trojan Shield**, the FBI operated its own encrypted device company, called “ANOM,” which was promoted by criminal groups worldwide. These criminals sold more than 12,000 ANOM encrypted devices and services to more than 300 criminal syndicates operating in more than 100 countries, including Italian organized crime, Outlaw Motorcycle Gangs, and various international drug trafficking organizations. The FBI engaged with the Australian Federal Police and Europol on the operation, which led to the arrests of over 800 individuals. In addition, the intelligence gathered from the devices yielded valuable insight into TCO methods of operation.
- Numerous complex operations in recent years have taken down Darknet marketplaces, hidden platforms that provide TCOs the ability to facilitate and conduct the sale of billions of dollars in illicit goods and services, such as illegal drugs, drug paraphernalia, and counterfeit and fraud-related goods and services. Many of these operations were undertaken by the Joint Criminal Opioid and Darknet Enforcement (JCODE) team, a DOJ initiative which partners with domestic federal agencies and international law enforcement to investigate TCOs using the Darknet to facilitate their illicit activities. Recent examples of takedowns include **Operation Dark HunTor**, which led to the arrest of 150 people worldwide and the seizure of weapons and drugs and over \$31 million, and **Operation DisrupTor**, which led to the arrest of 170 individuals in seven countries and seizure of more than 500 kilograms of illegal drugs. Intelligence gathered from the Darknet marketplace takedowns often provides valuable leads to spin off additional investigations and subsequent takedowns.

Pillar Three: Attack Transnational Organized Crime Enablers

Strategic Objective 3.1: Increase identification and targeting of facilitators

- Continue to identify foreign kleptocrats, government officials, and their facilitators engaged in criminal conduct with TCOs, including corruption, and target their assets for freezing or seizure, forfeiture, and where appropriate, repatriation to the people of the country harmed by the corruption and deny them U.S. visas. Efforts such as DOJ’s Kleptocracy Asset Recovery Initiative and Task Force Klepto Capture identify kleptocrats, target their assets, and prevent them from circumventing sanctions. Focusing on kleptocracy will undermine the enabling power of corruption and thwart the mutually-



beneficial relationships TCOs share with certain governments, including those of our adversaries.

- Consider additional authorities to impose penalties on facilitators (e.g., lawyers, real estate professionals, and trust and company service providers) who enable corruption and money laundering, including by working with U.S. states and professional organizations to levy professional sanctions.

Strategic Objective 3.2: Disrupt illicit finance pathway

- Streamline the approval and release process for transnational organized crime-related sanctions. Lead an interagency process to improve the velocity of the review procedure by departments and agencies to ensure that sanctions packages do not become less relevant while awaiting final approvals.
- Encourage law enforcement to strategically increase its use of FinCEN reporting to inform investigations. Available to both law enforcement and the Intelligence Community and consistent with applicable standards, FinCEN reporting can support investigations of transnational organized crime actors.
- Expand sharing as appropriate of strategic financial information with foreign financial intelligence units and other foreign government partners to increase mutual knowledge, on financial trends and shifts in the funding of TCOs' activities.
- Encourage departments and agencies to engage with relevant digital assets subject matter experts, such as DOJ's National Cryptocurrency Enforcement Team, to focus specifically on complex transnational organized crime investigations and prosecutions of criminal misuses of digital assets, including cryptocurrency, particularly crimes committed by virtual currency exchanges, mixing and tumbling services, and money launderers.
- Continue to support global implementation of international anti-money laundering standards to mitigate the use of virtual currency for illicit activities that undermine our national interest as part of our efforts to implement EO 14067, "Ensuring Responsible Development of Digital Assets." This will undermine the ability of TCOs to use virtual currency to move and launder illicit proceeds.

Strategic Objective 3.3: Develop new approaches to counter transnational organized crime cyber capabilities

- Engage with the private sector to craft educational messaging for the public to counter cyber-enabled fraud schemes and ransomware attacks. Messaging should discourage the public from paying ransoms but also provide suggestions on building resiliency and strengthening cybersecurity standards. Increasing awareness of new TCO trends pertaining to cyber-enabled fraud will make U.S. businesses and citizens more resilient to these types of crimes.
- Coordinate, deconflict, and synchronize existing interagency efforts to disrupt TCO-linked ransomware operations and provide support to private sector and state, local, tribal and territorial law enforcement efforts to increase their protections against ransomware.



- Engage with the Office of Personnel Management to explore ways to increase the training of existing workers and the recruitment and retention of employees with cyber, financial, and data analytics expertise. Because of the opportunities available in the private sector for personnel with these skill sets, it is difficult for the U.S. Government to compete. We need to be able to train, recruit, and retain employees with the necessary expertise in order to stay ahead of criminal trends and successfully investigate and prosecute TCOs.
- Increase the recruitment of human sources and use of signals intelligence to help address the challenges posed by criminals' use of end-to-end encrypted communications, which can prevent lawful access to information vital to investigation and prosecution of TCOs. As TCOs increasingly rely on end-to-end encrypted communications, we should engage private sector and the public, and explore other methods to gain lawful access to information.
- Raise awareness within departments and agencies of how the lack of lawful access to the content of communications and other information due to end-to-end encryption impacts countering transnational organized crime. Ensure transnational organized crime remains part of the discussion regarding technical solutions to enable authorized interceptions of communications content. Communications content admissible in court is essential to the success of criminal investigations and prosecutions.



Transnational Organized Crime and Counternarcotics Sanctions

Treasury’s Office of Foreign Assets Control (OFAC) implements transnational organized crime-related sanctions pursuant to E.O. 13581, “Blocking Property of Transnational Criminal Organizations,” as amended by E.O. 13863, “Taking Additional Steps to Address the National Emergency With Respect to Significant Transnational Criminal Organizations.” Broadly, these authorities allow OFAC to target persons engaged in or facilitating an ongoing pattern of serious criminal activity. OFAC commonly first identifies an entity as a significant TCO, then designates additional persons within the TCO for acting for or on behalf of the TCO or providing material support to the TCO. Beyond traditional established TCOs, OFAC can leverage these authorities in more novel ways such as to combat human smuggling and wildlife trafficking.

Counternarcotics sanctions often complement transnational organized crime-related sanctions authorities. E.O. 14059 of December 15, 2021, “Imposing Sanctions on Foreign Persons Involved in the Global Illicit Drug Trade” allows OFAC to sanction illicit actors globally involved in the international proliferation of illicit drugs or their means of production. To combat actors that operate in more diffuse and decentralized ways, E.O. 14059 enables OFAC to target any foreign person engaged in drug trafficking activities regardless of whether they are linked to a specific kingpin or cartel. Further, the authority authorizes sanctions against foreign persons who knowingly receive property that constitutes, or is derived from, proceeds of illicit drug trafficking activities. In sum, the authority builds on previous counternarcotics authorities to expose, isolate, and disrupt international drug trafficking organizations, their leaders, support networks, and the entire illicit drug ecosystem.

Pillar Four: Build International Capacity, Cooperation, and Partnerships

Strategic Objective 4.1: Convey consistent messages and priorities regarding transnational organized crime

- Increase coordination within departments and agencies and across the interagency on transnational organized crime messaging to foreign partners. Countering transnational organized crime should be a central part of all U.S. Government messaging, especially when we engage with source and transit countries with a significant transnational organized crime nexus to the United States.
- Bolster engagements with allies and partners to continue tightening pathways by which key gatekeepers and facilitator move money. Internationally, key facilitators for illicit finance and commodity (e.g., gold and other natural resources) flows include the transportation, logistics, and construction industries.



Strategic Objective 4.2: Use information-sharing tools and coordinate actions

- Increase U.S. use of international information sharing systems such as PICS, PEN and IONICS and encourage key foreign partners to do the same. Using these systems could reveal new transnational organized crime trends and lead to increased investigations and interdictions because of shared information.
- Increase bilateral and multilateral counternarcotics and transnational organized crime-related sanctions and complementary actions. Coordinating the issuance of our accountability tools with one or more additional countries makes it even more difficult for the individual or entity to operate, leading to a greater impact.

Strategic Objective 4.3: Build the capacity of our foreign partners to counter transnational organized crime

- Engage with like-minded foreign partners to build capacity in other countries to combat transnational organized crime. Although the United States is a major actor in the capacity-building space, we can turn to like-minded foreign partners with similar capabilities to help countries that need assistance.
- Ensure capacity building is implemented by the most appropriate organization/entity. In countries with endemic corruption, for example, the best partner to counter transnational organized crime might be non-governmental organizations, which could, support independent media in the uncovering of corruption and organized crime.
- Improve capacities of foreign partners, through training and mentoring provided by U.S. federal law enforcement to more efficiently provide/obtain evidence to/from the United States, including but not limited to electronic evidence and financial records.
- Ensure accountability and “off-roads” in our counter-transnational organized crime projects with foreign partners. When embarking on new initiatives, departments and agencies need to verify partners will follow through and fully implement, with accompanying consequences on failures to follow through. Similarly, because transnational organized crime evolves over time, new projects should be time-bound, with metrics for success.
- Expand transnational organized crime-related training and mentorships to foreign partner justice sector entities. Ensure this training captures emerging trends in transnational organized crime, like the challenges associated with cyber-enabled crime and synthetic drugs. Training builds good will and provides partners with a good foundation of best practices and procedures to increase their effectiveness. Training programs that incorporate long-term mentorships and bring individuals from multiple countries to learn together help create lasting networks that can be drawn upon by the trainees.
- Build partnerships with foreign regulatory agencies/boards to increase diversion training to willing foreign partners as well as foreign chemical and pharmaceutical companies. Establish a strong diversion investigator presence overseas to identify and prevent the diversion of controlled substances and listed chemicals.



Strategic Objective 4.4: Engage in closer collaboration with FVEY partners on transnational organized crime

- Engage in strategic collection on transnational organized crime with FVEY partners to better leverage the capabilities of all five countries. In a time of limited resources, we should work with our partners to be strategic in our approach to transnational organized crime collection, relying on our partners to fill gaps where we lack collection and they have resources and doing the same for them in turn.
- Increase the number of finished intelligence products on transnational organized crime released to FVEY partners and the number produced jointly with them. Highlighting trends for partners alerts them to transnational organized crime activities that may be on the horizon for their country, allowing them to better prepare and combat transnational organized crime in their own countries.
- Establish standardized mechanisms for sharing information on drug production, trafficking, and use trends to better understand and counter these threats, especially regarding fentanyl and other synthetic drugs.

Strategic Objective 4.5: Increase our involvement in formal and informal multilateral fora

- Strengthen our engagement with multilateral fora, such as the United Nations, G7, G20, Europol, and Interpol to develop initiatives and political commitments to counter transnational organized crime. Leveraging the capabilities of willing partners to counter transnational organized crime globally will limit the movements of TCOs and undermine their ability to successfully operate.
- Increase involvement in formal and informal fora like the Europe-based Camden Asset Recovery Interagency Network and its regional bodies, and the International Anti-Corruption Coordination Center, which has multi-country membership and observers. Engage directly with other countries' law enforcement to increase cooperation, particularly on investigations leading to asset recovery, and asset returns consistent with Global Forum on Asset Recovery principles. This includes work with countries where the corruption occurred and jurisdictions where the assets have been transferred. This also includes working with State and USAID to ensure that assistance in capacity building is consistent with U.S. law enforcement efforts and priorities to better ensure successful outcomes.
- Work with our allies and partners to develop new collaborative law enforcement mechanisms for the digital age. For example, the European Cybercrime Centre has played a vital role in modernizing legal frameworks, training law enforcement, improving attribution, collaborating with private sector partners, and responding to malicious cyber activities in Europe. To extend this model, we will support efforts to build effective hubs with partners in other regions.
- Elevate discussion of non-governmental stakeholder cooperation, including with civil society and the public-private sector, cooperation in key multilateral bodies, including the



Conference of Parties to the UN Convention Against Transnational Organized Crime (UNTOC), the Conference of the States Parties to the UN Convention Against Corruption (UNCAC), the G-7, G-20, UN Commission on Narcotic Drugs (CND), UN Commission on Crime Prevention and Criminal Justice (CCPCJ), US-EU Drugs Dialogue, Organization of American States, APEC, and North American Drug Dialogue.