



TESTIMONY OF

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ON

“Fentanyl and Fentanyl Analogues”

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Introduction

Acting Chair Pryor and distinguished Commissioners: Thank you for the opportunity to appear today to discuss the role of U.S. Customs and Border Protection (CBP) in combating the flow of dangerous opioids, including the synthetic opioid, fentanyl and its analogues, into the United States.

The use and availability of heroin and other illegal opioids, as well as the illegal use of prescription opioids in the United States, have been increasing at an alarming rate. The situation is one of the most important, complex, and difficult challenges our Nation faces today. According to the Centers for Disease Control and Prevention, from 2014 to 2015, there was a 72 percent increase in deaths involving synthetic opioids.¹ Deaths from drug overdoses are the number one cause of accidental deaths in the United States.²

An increasing number of deaths involving opioids have been attributed to synthetic opioids such as fentanyl.³ The number of fentanyl-related law enforcement encounters more than doubled in the U.S. from 5,343 in 2014 to 13,882 in 2015.⁴ Fentanyl depresses the central nervous system and respiratory function to alleviate pain without the loss of consciousness. At first glance, it is often mistaken for other drugs which appear as white powders, such as cocaine or heroin.

As America's unified border agency, CBP plays a critical role in preventing dangerous drugs, including opioids, from reaching the American public. Interdicting drugs at and in between our Ports of Entry (POEs), leveraging targeting and intelligence-driven strategies, and working with our partners to combat Drug Trafficking Organizations (DTOs) and Transnational Criminal Organizations (TCOs) are key components of our multi-layered, risk-based approach to enhance the security of our borders and our country. This layered approach reduces our reliance on any single point or program, and extends our zone of security outward, ensuring our physical border is not the first or last line of defense, but one of many. CBP is on the frontlines everyday securing the border, and as such, has considerable equities in disrupting the opioid supply chain from entering the country.

Fentanyl Trends, Interdictions, and Challenges

Interdicting illicit drugs, particularly synthetic opioids, is both challenging and complex. The majority of U.S. trafficked illicit fentanyl is produced in other countries such as China, and is principally smuggled through international mail facilities (IMFs), express consignment carrier facilities (ECCFs; e.g., FedEx and UPS), or through POEs along the Southern land border. While seizures are not a reliable indicator of drug flow, the dramatic increase in seizures is a strong indicator that more fentanyl is entering the U.S. CBP seizures of fentanyl remain relatively small

¹ <https://www.cdc.gov/drugoverdose/data/fentanyl.html>

² Per <https://www.cdc.gov/cdcgrandrounds/archives/2017/january2017.htm>

³ Per <https://www.cdc.gov/drugoverdose/epidemic/index.html>

⁴ Per <https://www.cdc.gov/drugoverdose/data/fentanyl-le-reports.html>

⁵ FY 2016 Border Security Report, U.S. Customs and Border Protection, <https://www.cbp.gov/sites/default/files/assets/documents/2016-Dec/CBP-fy2016-border-security-report.pdf>

compared to heroin, but have significantly increased over the past four years, from approximately one kilogram seized in fiscal year (FY) 2013, and 208 kg in FY 2016. In FY 2017, CBP seized a total of nearly 550 kg of fentanyl, representing a 160 percent increase from last FY. Fentanyl is the most frequently seized illicit synthetic opioid, but CBP has also encountered various types of fentanyl analogues.⁵

The number of types of fentanyl (and fentanyl-class compounds) seen by CBP Laboratories and Scientific Services (LSS) has rapidly increased from the very first instances (prior to FY 2006), to the more recent wave in FY 2008 (3 laboratory submissions) to 120 submissions in FY 2016. For FY 2017, 333 fentanyl and fentanyl-class compounds have been analyzed by CBP in the agency's laboratories. The breakdown for the fentanyl class compounds seen in FY 2016 were fentanyl (61), furanylfentanyl (29), and acetylfentanyl (12). The breakdown for the fentanyl class compounds seen in FY 2017, were fentanyl (90), and furanylfentanyl (71), methoxyacetylfentanyl (38), cyclopropylfentanyl (30), and acetylfentanyl (9), with furanylfentanyl becoming much more prevalent. Additionally, laboratory submissions of key starting materials to make fentanyl, such as 4-anilino-N-phenethyl-4-piperidine (ANPP), N-Phenethyl-4-piperidinone (NPP), and benzylfentanyl rose from 3 in FY 2016 to 29 in FY 2017.

U.S. law enforcement suspects that there are also some clandestine fentanyl production labs in Mexico that obtain precursor chemicals from China. Heroin is sometimes spiked with fentanyl to increase drug potency, or fentanyl is mixed with adulterants and sold as "synthetic heroin." This practice stretches the product of DTOs, increasing profits. The practice also increases the safety risk to heroin users, who unknowingly purchase heroin of unpredictable strengths and compositions. The practice of mixing fentanyl with other substances also makes it more challenging for CBP to pinpoint exactly how much fentanyl is seized.

One way in which opioids, and particularly synthetic opioids, enter the United States is through web-based transactions. DTOs and individuals purchase fentanyl online and can access open source and dark web marketplaces for the tools needed for manufacturing. Fentanyl, pill presses, and binding agents are then shipped into the United States primarily using the U.S. Mail or express consignment couriers, such as FedEx, UPS, and DHL. We believe these transactions made over both the open and dark webs and comprised of smaller quantities of fentanyl- as small as a single gram- will likely continue in FY 2018. Based on increased flow and improved detection capabilities, CBP anticipates that both heroin and fentanyl seizures will rise over FY 2018.

The advent of e-commerce has added another layer of complexity to this problem. In the mail and express consignment environments, DTOs and individual purchasers move fentanyl in small quantities to try to evade detection. CBP operates within nine major IMFs inspecting international mail arriving from more than 180 countries. However, it is difficult to interdict fentanyl and other synthetic drugs due to a lack of uniform advanced cargo information which would aid in targeting shipments. CBP is also challenged by the sheer volume of mail and the hazardous nature of various types of synthetic drugs. Due to the lack of advance data, the processing of inbound international mail is primarily manual, requiring CBP Officers to sort through large bags or bins

⁵ These include: acetylfentanyl, butyrylfentanyl, beta-hydroxythiofentanyl, para-fluorobutyrylfentanyl, pentanoylfentanyl, alpha-methyl acetylfentanyl, para-fluoroisobutyrylfentanyl, para-fluorofentanyl, carfentanil, furanylfentanyl, and most recently benzodioxolefentanyl, acrylfentanyl, and methoxyacetylfentanyl.

of parcels. This manual process, again coupled with the tremendous volume of inbound mail to the United States, creates a daunting task for CBP. Despite these difficulties in the mail environment, CBP officers continue to utilize experience and canines to target suspect packages for inspection. To cite just one example, on April 20, 2017, CBP Officers working at the IMF in Chicago, Illinois, intercepted a package from China destined for LaFayette, Indiana, that was not manifested and had no declared value. CBP Officers selected the package for further examination due to prior seizures utilizing similar packaging. A physical examination of the package revealed 1.03 kg of a fentanyl analogue.

While most illicit drug smuggling attempts occur at Southwest land POEs, the smuggling of illicit synthetic drugs in the mail and Express Consignment Carrier (ECC) environment is a growing threat that CBP is addressing. Several different types of illicit synthetic drugs, or “designer drugs,” including synthetic opioids such as fentanyl, synthetic cannabinoids, and synthetic cathinones are currently being sold and shipped to end-users in the United States. CBP and the United States Postal Service (USPS) formalized a Memorandum of Understanding (MOU) on September 1, 2017 in which both agencies will collaborate together on day-to-day operations, strategic planning, and other initiatives related to the inspection of goods imported and exported through the mail. In addition, CBP will also collaborate with ECC’s and the USPS to improve enforcement operations at ECC and USPS facilities.

Smugglers use a wide variety of tactics and techniques for concealing drugs. CBP Officers regularly find drugs concealed in body cavities; taped to bodies (body carriers); hidden inside vehicle seat cushions; gas tanks; dash boards; tires; packaged food; household and hygiene products; in checked luggage; and concealed in construction materials on commercial trucks.

The detection of fentanyl remains challenging due to limited field testing capabilities and the myriad of fentanyl analogues on the market. CBP is currently testing and exploring new technology to be able to do even more accurate testing in the field. Currently, suspect substances are sent to CBP’s Laboratories and Scientific Services Directorate (LSS) for identification. CBP’s LSS is an integral resource in efforts to combat opioids. LSS is the forensic/scientific arm of CBP and provides, among other things, suspected controlled substance analysis. Due to the increasing flow of opioids to the United States, CBP plans to evaluate the feasibility of increasing more LSSD satellite and mobile laboratories throughout the country. CBP continues to conduct special research to determine the identification of signature odor profiles for fentanyl-related compounds to aid in our detection capabilities.

CBP Resources and Capabilities to Detect, Target, and Interdict Opioids

CBP has made significant investments and improvements in our drug detection and interdiction technology and targeting capabilities. These resources, along with enhanced information sharing and partnerships, are critical components of CBP’s ability to identify and deter the entry of illicit drugs in all operational environments.

CBP's Targeting Efforts

Global trade and travel continue to increase in pace, and threats to the United States and our allies continue to evolve. Adversaries are always attempting to exploit vulnerabilities in global travel and supply chains. The targeting efforts within CBP where advanced data and access to law enforcement and intelligence records converge to facilitate the targeting of those travelers and items of cargo which pose the highest risk to our security. CBP employs a layered enforcement strategy taking in large amounts of data, and using sophisticated targeting tools and subject matter expertise to analyze, assess, and segment risk at every stage in the trade and travel life cycles. As the focal point of that strategy, CBP leverages classified, law enforcement, commercial, and open-source information in unique, proactive ways to identify high-risk travelers and shipments at the earliest possible point prior to arrival in the United States.

CBP's targeting addresses illicit narcotics smuggling on a global scale through an aggressive targeting and analysis program, identifying narcotics smuggling schemes in all modes of inbound transportation. CBP has the lead role for DHS of identifying and responding to global trends and patterns in the narcotics trade. CBP targeting have identified numerous smuggling trends and combatted DTOs by successfully identifying shipments of drugs, pill presses, and precursor chemicals.⁶ CBP is continuously developing and updating targeting protocols to identify opioids, synthetic narcotics, and precursors to address the increasing deaths and criminal activity threat.

To bolster its targeting mission, the dedicated men and women of the CBP collaborate with critical partners on a daily basis including U.S. Immigration and Customs Enforcement – Homeland Security Investigations (ICE-HSI), the Drug Enforcement Administration (DEA), the Federal Bureau of Investigation (FBI), members of the Intelligence Community, and the United States Postal Inspection Service (USPIS). Moreover, CBP works in close coordination with several pertinent task forces, including the Organized Crime Drug Enforcement Task Force, the High Intensity Drug Trafficking Areas, and the Joint Interagency Task Force-West, as well as the Department's Joint Task Force-West and Joint Task Force–Investigations.

⁶ Currently the two main materials that are used to produce fentanyl, NPP and ANPP, are federally regulated. However, other precursor chemicals used to produce fentanyl are currently non-regulated and also have legitimate uses. CBP has the authority to seize precursors if they can be identified as having illicit end-uses, including the production of illicit drugs. CBP targets precursor chemicals transiting the United States with destinations to Mexico and other countries. When these shipments are identified through interagency collaboration as having illicit end-uses, the shipments are offloaded for further inspection and enforcement action by external agencies such as the DEA and ICE-HSI.

In addition to targeting illicit substances directly, CBP also targets related equipment such as pill presses and tablet machines. DEA regulates pill press/tablet machines. Additionally, there is an ICE Diversion Coordinator assigned to the DEA Special Operations Division (SOD) who oversees the investigations of pill press/tablet machine imports being diverted for illicit uses. The Diversion Coordinator works closely with the NTC to identify and target individuals importing and diverting pill press/tablet machines to produce fentanyl and other synthetic drugs. In FY 2014, 24 pill press/tablet machines were seized by CBP, and the number increased to 51 in FY 2015 and 58 in FY 2016.

Non-Intrusive Inspection Equipment

At our POEs, CBP's Office of Field Operations (OFO) utilizes technology, such as non-intrusive inspection (NII), X-ray, and gamma-ray imaging systems to detect the illegal transit of synthetic drugs hidden on people, in cargo containers, and in other conveyances entering through POEs, and at international mail and express consignment carrier facilities. Since September 11, 2001, NII technology has been a cornerstone of the CBP multi-layered enforcement strategy. As of October 1, 2017, 304 Large-Scale (LS) NII systems are deployed to, and in between, our POEs. These LS NII systems are utilized to conduct approximately 6.4 million examinations annually⁷ on cargo and conveyances in the land, air, and sea environments, which result in approximately 2,500 NII seizures, including more than 350,000 pounds of narcotics, and more than \$3.25 million in U.S. currency each year.

Along the Southwest Border

Along the Southwest border, between the POEs, CBP has deployed capable resources to increase our situational awareness, identify changes in the border environment, and rapidly respond, as appropriate, to emerging threats and areas of increasing risk or illegal cross-border activity. The use of tactical infrastructure and advanced surveillance and detection technology in the border environment is an invaluable force multiplier to increase situational awareness. For example, CBP's Tactical Aerostats and Re-locatable Towers program, originally part of the Department of Defense (DoD) Reuse program, uses a mix of aerostats, towers, and electro-optical/infra-red cameras, to provide U.S. Border Patrol (USBP) with increased situational awareness through an advanced surveillance capability over a wide area. This capability has proven to be a vital asset in increasing CBP's ability to detect, identify, classify, and track activity. Since initial deployment, these systems have been responsible for the detection of more than 180,000 illegal border incursions of aliens and smugglers, leading to the seizure of approximately 180 tons of narcotics and related contraband headed toward our Nation's cities and neighborhoods. As of October 31, 2017, USBP Agents, with the assistance of existing aerostats and re-locatable towers, have seized 100 tons of narcotics, and caught more than 25,000 illegal border crossers detected in aerostat locations during FY 2017.

Detection Technology and Canines

In the fourth quarter of FY 2016, OFO conducted a pilot with the San Diego Field Office and the LSSD Los Angeles Laboratory to evaluate new testing methods for the identification of fentanyl. The pilot tested four handheld tools along with a new reagent test kit to provide immediate presumptive testing for fentanyl. Of the four tested, the Gemini Analyzer proved to be the most reliable instrument. The Gemini system combines Raman with FT-IR technology and encompasses a software library that evaluates and identifies liquid and chemical explosives. Based on the results of the pilot, OFO procured twelve Gemini systems and assigned a Program Manager to provide a Fentanyl Safety Brief for the CBP officers across San Diego, Tucson, El Paso, and Laredo Field Offices. Because of the successes and positive feedback from this pilot program,

⁷ Average number of NII examinations between Fiscal Year (FY) 2010 – 2016. Source: CBP Office of Field Operations (OFO) Cargo and Conveyance Security (CCS) Non-Intrusive Inspection Division - Data Reports, average examination rate between Fiscal Year (FY) 2010 – 2016.

OFO procured an additional 82 handheld analyzers, test kits, and the necessary protective equipment to conduct non-contact sampling on-site. The systems are being deployed in the international mail, ECC cargo facilities and at POEs around the country. All mail and ECC cargo facilities will have this technology deployed by the 2nd Quarter of Fiscal Year 2018.

Canine operations are an invaluable component of CBP's counternarcotic operations. CBP deploys more than 1,200 Narcotic Detection Canine teams at our Nation's POEs. Synthetic opioids present unique challenges to canine teams due to the potency of the drug and the associated danger to the health and safety of the canines and their handlers. Thus, CBP LSS has been conducting special research to identify signature odor profiles for fentanyl and its analogues. The relevant CBP components are working together to better train canines. CBP OFO expects to have all operational narcotic detection canine teams trained on the odor of fentanyl by the end of the second quarter, Fiscal Year 2018.

Technology and canine detection capabilities are critical components of CBP's security operations at mail and ECC cargo facilities. These capabilities are used in conjunction with advance information and targeting capabilities to effectively and efficiently detect and interdict dangerous illicit drugs.

From the Air and the Sea

CBP's Air and Marine Operations (AMO) is an essential component of a successful integrated strategy for border security, as well as a significant contributor to the national security and emergency response efforts of various Federal, state, tribal, and local agencies. AMO operates aerial and marine assets – including unmanned aircraft systems and strategic and tactical aerostats – providing critical surveillance coverage and domain awareness for counternarcotic efforts on the ground, in the air, and at sea. Additionally, CBP's Air and Marine Operations Center (AMOC), located in Riverside, CA maintains a sophisticated domain awareness architecture comprised of integrated sensors (i.e. Tethered Aerostat Radar System – TARS) critical in providing a significant level of domain and situational awareness. Nationally, AMO contributed to the seizure of 396 kg. of heroin; 53.5 kg. of fentanyl; 122,000 kg of cocaine; 174000 kg. of marijuana; and 2,573 arrests in FY 2017.

In the maritime domain, AMO employs high speed Coastal Interceptor Vessels that are specifically designed and engineered with the speed, maneuverability, integrity and endurance to intercept and engage a variety of suspect non-compliant vessels in offshore waters, as well as the Great Lakes on the Northern border.

AMO P-3 Orion Aircraft (P-3s) have also been an integral part of the successful counternarcotic missions operating in coordination with Joint Interagency Task Force South (JIATF-S). The P-3s patrol in a 42 million-square mile area known as the Source and Transit Zone, which includes more than 41 nations, the Pacific Ocean, Gulf of Mexico, Caribbean Sea, and seaboard approaches to the United States. During FY 2017, Air and Marine Operations contributed to 153 seizures or disruption events in the transit zone, resulting in the interdiction of over 93,440 kg of cocaine.

Laboratory Testing

Due to the risk of unintentional exposure and subsequent hazardous drug inhalation and/or potential absorption, the confirmatory testing for the presence of synthetic opioids such as fentanyl is best executed in a laboratory by trained scientists and technicians. Expedited analysis can have a turnaround time of a day or two; the turnaround time for non-expedited samples can take up to two months. LSS has the appropriate laboratory technology and resources to test for synthetic opioids such as fentanyl and its analogues.

The composition and size of smuggled packages seized at the Land Ports of Entry (LPOE) are different from those at the Express Courier Consignment Facilities (ECCFs) and IMFs. The narcotics seized at the IMFs and ECCFs usually have an estimated purity of greater than 90 percent, while the purity of seizures along the Southwest border average around 7 percent controlled substance content due to DTOs practice of mixing synthetic opioids with other substances. Accordingly, different techniques and instrumentation are used to identify illicit drugs at the different venues. At the IMFs and ECCFs, the data transmitted to LSS for interpretation, without the instrument providing presumptive results directly to the officer, while at the LPOEs, the instruments provide presumptive results to the Officer and Agents.

The low purities of fentanyl found along the Southwest border, the detection limits of the instruments, and the instrument's ability to correctly interpret chemical spectra at these low levels, all add to the difficulty of detecting fentanyl in this environment. As such, the best way to combat the ever-changing designer drug industry is LSS' Field Triage Infrared Reachback program. Even if drugs have not been seen before, trained scientists have a virtual presence in the IMF and ECCF environments and can reasonably identify classes of drugs and can flag them for comprehensive testing. The triage program utilizes ruggedized equipment whose data is transmitted to scientific personnel to provide presumptive results within one business day. LSS is working to expand the field testing program, along with the scientific assets and personnel who are able to provide real-time chemical composition determinations. When any synthetic opioids are detected by the reachback program, LSS notifies key CBP personnel at the NTC-C as well as the liaisons with DEA's Special Operations Division (SOD), so they can generate near real-time intelligence and see if controlled deliveries can be executed based in the scientific support.

Advance Information, Targeting, and Information Sharing

Substantive and timely information sharing is critical in targeting and interdicting shipments as well as individuals who move drugs and illicit merchandise from the POEs to their destinations throughout the United States. CBP contributes to the whole-of-government effort to identify and disrupt sophisticated routes and networks used by DTOs for the smuggling of illicit drugs by sharing critical information on individuals and cargo with investigative and intelligence partner agencies.

An important element of CBP's layered security strategy is obtaining advance information to help identify shipments that are potentially at a higher risk of containing contraband. Under various statutes, including the *Trade Act of 2002* (Pub. L. No. 107-210), as amended, CBP has the legal authority to collect key air and maritime cargo data elements provided by air, sea, and land commercial transport companies — including express consignment carriers and importers. This information is automatically fed into CBP's Automated Targeting System, an intranet-based

enforcement and decision support system that compares cargo and conveyance information against intelligence and other enforcement data.

CBP is working to implement the same effective module in the international mail environment. USPS receives mail from more than 180 countries, the vast majority of which arrives via commercial air or surface transportation. As discussed above, inbound international mail inspections are largely conducted by hand. The international mail system is not integrated and there are few opportunities for foreign postal administrations to provide advance manifest data to USPS (which may then be passed on to CBP), although a number of voluntary pilot programs enable CBP to obtain some advance information. CBP and USPS continue to work together to improve this metric to meet both agencies' performance expectations, and CBP continues to work with the USPS and the Universal Postal Union to address the issue of electronic advanced data.⁸

Operational Coordination

The Department's Unity of Effort initiative has put in place new, stronger management processes to enable more effective, integrated DHS component operations to address TCOs, DTOs, and other cross-border threats. In addition, DHS-wide border and maritime security activities are guided by the new Southern Border and Approaches Campaign Plan. Aimed at leveraging the range of unique Department roles, responsibilities, and capabilities, the Campaign enhances our ability to work together in a more unified way to address these comprehensive threats. Three new joint task forces (JTF) were created to support this Campaign and to coordinate the efforts of the combined resources of DHS component agencies. Joint Task Force-East is responsible for the maritime approaches to the United States across the southeast, from the Gulf of Mexico to the Caribbean. Joint Task Force-West (JTF-W) is responsible for the Southwest land border from Texas to California. And, supporting the work of the other two task forces is a standing Joint Task Force for Investigations (JTF-I). These three JTFs reached full operational capability on July 30, 2015.

CBP also works extensively with our other Federal, state, local, tribal, and international partners and provides critical capabilities toward the whole-of-government approach to address drug trafficking and other transnational threats at POEs and along the Southwest border, Northern border, and coastal approaches. Our targeting, detection and interdiction efforts are enhanced through special joint operations and task forces conducted under the auspices of multi-agency

⁸ Per Transportation Security Administration (TSA) regulation, international mail destined for the United States is considered air cargo and, as a result, is subject to all existing security controls. These security controls, which include screening for explosives and other unauthorized incendiaries items in accordance with TSA regulations and security program requirements, are applied outside the United States prior to transporting international mail on aircraft regulated by TSA. These requirements are not dependent on advance electronic manifest data, as provided by express consignment operators and other participants in the Air Cargo Advance Screening (ACAS) pilot program.

Upon arrival in the United States, all international mail requested for inspection by CBP is turned over to CBP by USPS. CBP screens all international mail for radiological threats, x-rays all international mail packages presented by USPS, and physically examines those deemed to be high-risk. Although this process is largely manual and labor intensive, CBP is able to identify items that pose a risk to homeland security and public safety while facilitating legitimate mail.

enforcement teams. These teams are composed of representatives from international and Federal law enforcement agencies who work together with state, local, and tribal agencies to target drug and transnational criminal activity, including investigations involving national security and organized crime. I noted some of NTC's key partnerships above, and as of April 2017, the NTC has two permanent USPS employees working within the NTC narcotic targeting units under a recent Memorandum of Understanding (MOU).

CBP continues to collaborate and strengthen ties with investigative partners from the USPS, ICE, and DEA. CBP is sharing information with these agencies and conducting joint enforcement initiatives including intelligence-driven special operations designed to identify and disrupt drug smuggling at the border. CBP is also actively working with DEA's SOD to link foreign synthetic drug mail shipments and suppliers to domestic distribution networks in furtherance of investigative cases and to identify new shipments.

DTOs are known to use legitimate commercial modes of travel and transport to smuggle drugs and other illicit goods. Therefore, CBP also partners with the private sector to provide anti-drug smuggling training to carriers to assist CBP with stopping the flow of illicit drugs; to deter smugglers from using commercial carriers to smuggle drugs; and to provide carriers with the incentive to improve their security and drug smuggling awareness. Participating carriers sign agreements stating that the carrier will exercise the highest degree of care and diligence in securing their facilities and conveyances, while CBP agrees to conduct site surveys, make recommendations, and provide training.

Conclusion

CBP, in coordination with our partners, will continue to refine and further enhance the effectiveness of our detection and interdiction capabilities to combat transnational threats and the entry of opioids and other illicit drugs into the United States. We will continue to work with our law enforcement partners to improve the efficiency of information sharing; guide strategies; identify trafficking patterns and trends; develop tactics; and execute operations to address the challenges and threats posed by DTOs to the safety and security of the American people.

Acting Chair Pryor and distinguished Commissioners, thank you for the opportunity to testify today. I look forward to your questions.