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*USNORTHCOM Mexican Transnational Criminal
Organizations Counter Threat Finance Study Series*

Identification of Counter Threat Finance Entry Points and Prioritization of US Northern Command Support

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Executive Summary

In August 2010, the Department of Defense (DoD) directed combatant commands to establish a dedicated counter threat finance (CTF) capability that would integrate intelligence and operations, analyze financial intelligence, and coordinate the execution of DoD CTF activities in accordance with existing authorities, regulations, and combatant command initiatives.¹ The United States Northern Command (USNORTHCOM) asked the Joint Advanced Warfighting Program (JAWP) at the Institute for Defense Analyses to provide a series of critical analyses of the authorities, responsibilities, and limitations that would guide the command's CTF mission. This document, part of the series produced for USNORTHCOM, identifies key US Government (USG) agencies that have a stake in efforts to deter, disrupt, and dismantle the financial networks of the Mexican transnational criminal organizations.

The JAWP team developed recommendations based on interviews with the stakeholders, team members' experiences working in law enforcement and CTF communities, and an analysis of the roles, missions, and responsibilities of those agencies. The specific question the JAWP team answered for USNORTHCOM was where the command should place its limited CTF resources in order to obtain the greatest return on investment. The study concluded that USNORTHCOM will derive the most benefit in terms of supporting mission partners' CTF activities by placing two representatives, on a permanent-change-of-station basis, at the four CTF points identified below (each USNORTHCOM representative would support two of the organizations).

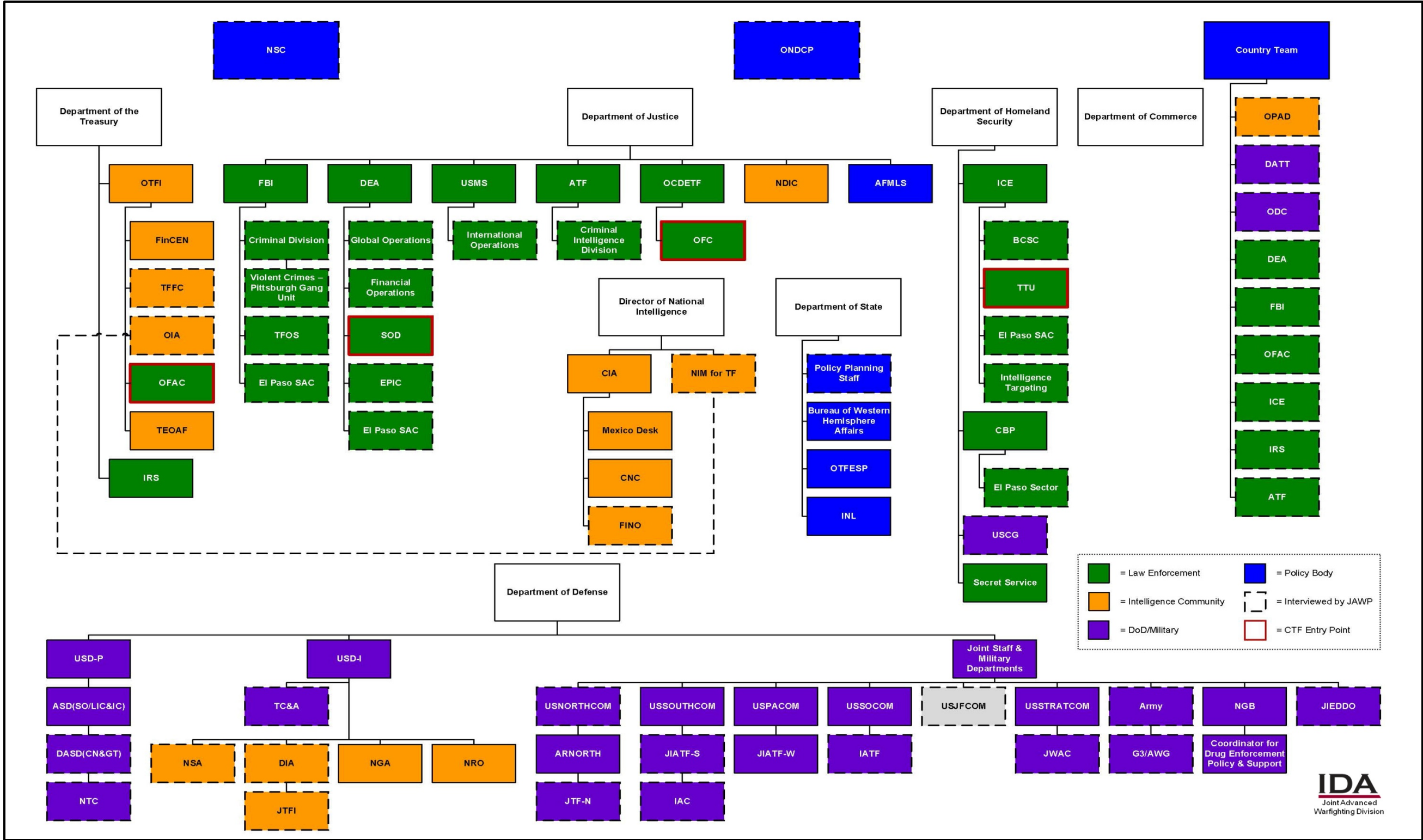
- Drug Enforcement Administration – Special Operations Division (SOD)
- Department of Justice – Organized Crime Drug Enforcement Task Force (OCDETF) Fusion Center (OFC)
- Department of the Treasury – Office of Foreign Assets Control (OFAC)
- Immigration and Customs Enforcement – Trade Transparency Unit (TTU)

The *JAWP USG CTF Stakeholders and Entry Points* figure on page v depicts key stakeholders involved in countering the Mexican transnational criminal organizations; these are characterized as *law enforcement*, *Intelligence Community*, *policy body*, and *DoD/military* entities. The diagram should be regarded as a dynamic product, because the USG CTF community continues to develop new organizations, authorities, and capabilities.

The stakeholders interviewed as part of the research for this task are indicated by a bold, dashed line in the figure. Recommended CTF entry points for USNORTHCOM representatives, outlined in red, are SOD, OFC, OFAC and TTU. As the CTF mission matures and new capabili-

ties are added, other stakeholders may emerge. It is possible that one or more of the new CTF entities will request or merit direct support from USNORTHCOM.

JAWP recommends that USNORTHCOM place two uniformed representatives in the Washington, DC area—one to divide time between SOD and OFC, the other to divide time between TTU and OFAC. The USNORTHCOM representatives will (1) add value to the analytical and/or operational activities of the recommended CTF entry-point stakeholders; (2) inform mission partners about DoD capabilities available to support CTF missions; (3) facilitate requests for DoD support; and (4) provide information to USNORTHCOM regarding law enforcement operations. Through access to other participating agencies' information sources and datasets, and broader engagement with the stakeholders, the representatives will also be well positioned to inform the command about CTF operations. This enhanced engagement will help USNORTHCOM better support interagency and host nation partners.



JAWP USG CTF Stakeholders and Entry Points

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1. Introduction

When United States Northern Command (USNORTHCOM) was directed to develop a counter threat finance (CTF) capability, the command asked the Joint Advanced Warfighting Program (JAWP) at the Institute for Defense Analyses for assistance.² The JAWP team constructed a CTF framework to help USNORTHCOM allocate its resources to support Government of Mexico (GoM) and US Government (USG) CTF activities to counter the financial networks that support Mexican transnational criminal organizations (TCO). In December 2010, JAWP met with USNORTHCOM leaders to identify the command's requirements. This document is part of the JAWP series for the "USNORTHCOM Mexican Transnational Criminal Organizations Counter Threat Finance Study," and identifies CTF stakeholders and key entry points for the command's representatives.

* * * * *

This document identifies USG CTF stakeholders involved in countering the financial networks of TCO) in Mexico³ those stakeholders that USNORTHCOM should engage in order to support mission partners' CTF efforts. JAWP developed these recommendations based on interviews with the stakeholders and on team members' experience working in the law enforcement and CTF communities, as well as on analysis of the roles, missions, and responsibilities of those communities. The specific question the JAWP team answered for USNORTHCOM was where the command should place its resources in order to obtain the greatest return on investment for its CTF mission to deter, disrupt, and dismantle the financial networks that support and enable Mexican TCOs.

Figure 1 depicts USG CTF stakeholders that play a role in countering the networks that fund the Mexican TCOs, which are characterized as *law enforcement*, *Intelligence Community*, *policy body*, and *DoD/military* entities . Those indicated by a bold dashed line in the figure were interviewed by JAWP to elicit their perspectives on CTF initiatives in Mexico and the United States and to determine the types of DoD support desired. Not all stakeholders were interviewed, either because the team was already familiar with the stakeholder's mission and operations, or could obtain enough information to inform a judgment through research, including interviews with other agencies that interact with the agency in question.

In general, the CTF stakeholders interviewed understood neither USNORTHCOM support capabilities nor the processes they could use to obtain the command's support. Some mission partners' requests for support were funneled to DoD through channels that

the stakeholders established before the 2002 establishment of USNORTHCOM. As part of the interview process, the JAWP team received numerous stakeholder suggestions for the types of support USNORTHCOM could provide. The study team identified examples of those suggestions in briefings to the command's leadership. Examples of stakeholder request for support from USNORTHCOM include the following:

- USNORTHCOM representatives at identified CTF entry points
- Analytical support
- Linguistic support
- Sensitive Site Exploitation
- DOCEX (to include collection, exploitation, and analysis)
- Fund a wire room for processing judicial intercepts
- Capacity-building programs for GoM counterparts
- Other specialized resources such as drug detection dogs, forensics accountants, etc.
- Technology such as Intelligence Surveillance Reconnaissance (ISR) platforms, sensors, tagging, tracking and locating technologies, and analytical software/hardware.

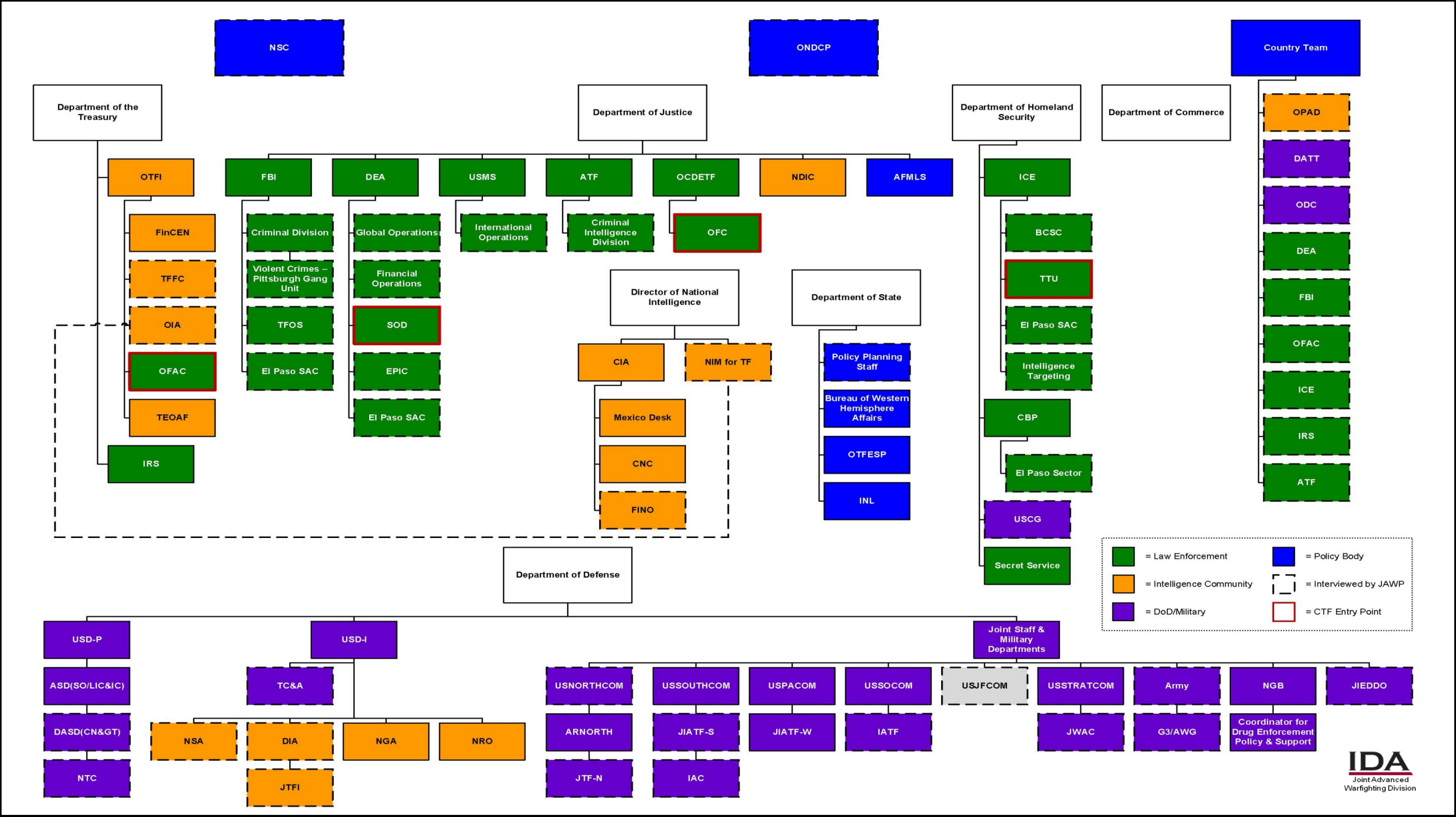


Figure 1. JAWP USG CTF Stakeholders and Entry Points

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2. CTF Entry Points for USNORTHCOM

A. Identified CTF Entry Points

USNORTHCOM has limited resources to conduct its CTF mission, particularly in terms of placing representatives with USG stakeholders full time. JAWP carefully weighed the placement of USNORTHCOM personnel with other CTF stakeholders and identified four USG entities for USNORTHCOM uniformed representatives to support in the near term; each is described below.

1. Special Operations Division

The US Drug Enforcement Administration's Special Operations Division (SOD) has the participation of law enforcement, intelligence, and military entities (see Figure 2) and is focused on dismantling the command-and-control and financial operations of transnational criminal organizations that operate across jurisdictional boundaries. SOD's capability to take advantage of interagency information-sharing mechanisms and to generate pertinent, real-time investigative information enables it to play a critical role in coordinating multi-agency operations against these transnational networks.

SOD provides a central hub for investigators and analysts to share the information required to identify and target key command-and-control nodes of the Mexican TCO networks, while maintaining up-to-date situational awareness on operations and activities against these networks. SOD coordinates the majority of US technical and analytical operations against the Mexican TCOs, whether in Mexico or elsewhere around the world.

Department of Justice
Drug Enforcement Administration
Department of Justice Criminal Division
Federal Bureau of Investigation
Bureau of Alcohol, Tobacco, Firearms, and Explosives
US Marshals Service
National Drug Intelligence Center
Department of Homeland Security
US Immigration and Customs Enforcement
Customs and Border Protection
US Secret Service
Department of the Treasury
Internal Revenue Service
Department of State
Diplomatic Security Service
Intelligence Community
National Security Agency
Central Intelligence Agency
Department of Defense
Joint Interagency Task Force – South
Joint Interagency Task Force – West
Defense Intelligence Agency
US Special Operations Command
US Northern Command
Office of Naval Intelligence
Marine Corps Intelligence Activity
US Coast Guard
Other Federal Agencies
US Postal Inspection Service
Food and Drug Administration
Department of Labor
Foreign
British Serious Organised Crime Agency

Figure 2. SOD Participating Agencies

A USNORTHCOM representative at SOD would add value by:

- Supporting multi-jurisdictional, interagency operations through access to real-time intelligence and information.
- Interacting with interagency entities (federal law enforcement, military, and intelligence) in one location.

- Gaining decisive intelligence that, in turn, could be shared with other CTF and counter-TCO activities at USNORTHCOM.
- Having greater visibility into ongoing activities against the Mexican TCOs, which would enable the representative to identify future areas of desired support from USNORTHCOM.
- Educating mission partners on what capabilities DoD possesses and which processes are available through USNORTHCOM to request support.

The JAWP team interviewed a representative from United States Special Operations Command (USSOCOM) formerly assigned to SOD who viewed it as the fusion center for all law enforcement efforts involved in identifying the nexus between threat finance and terrorism. On many occasions, SOD officials have indicated they would welcome the presence of a full time or temporary USNORTHCOM representative to learn more about the command's capabilities. The representative would serve as a mission enabler by supporting CTF and counter-TCO activities against Mexican networks.

2. Organized Crime Drug Enforcement Task Force Fusion Center

Established in 2006, the Organized Crime Drug Enforcement Task Force (OCDETF) Fusion Center (OFC) is a multi-agency, intelligence fusion center. It provides participating US law enforcement access to analytical resources and sophisticated technical capabilities to develop comprehensive intelligence pictures of drug trafficking organizations and their financial infrastructures.

OFC maintains unique data sets—currently inaccessible to USNORTHCOM—that could inform the command's analyses of the Mexican TCOs' financial networks. The USNORTHCOM representative would serve as a force-multiplier to OFC's analytical efforts and would use the information obtained to generate leads for the command's analysts. The representative would learn about the types of information available that could enhance USNORTHCOM's CTF efforts.

OFC administrators have indicated they would welcome a relationship with USNORTHCOM. Similar to the value that a USNORTHCOM representative would bring to SOD, one at OFC would enhance the center's analytical efforts and, in turn, could inform other analysts and individuals engaged in the CTF and counter-TCO missions at the command.

3. Office of Foreign Assets Control

The US Department of the Treasury, through the Office of Foreign Assets Control (OFAC), is the primary USG administrator and enforcer of economic and trade sanctions against targeted foreign countries and regimes, terrorists, international narcotics traffickers, proliferators of weapons of mass destruction, and other threats to the national security of

the United States. This office acts under presidential national emergency powers and possesses authorities granted by specific legislation to impose controls on transactions and freeze assets under US jurisdiction.⁴

OFAC has successfully invoked sanctions against major narcotics traffickers in coordination with foreign governments and US law enforcement as part of a “whole of government” approach to countering TCO networks. The Treasury Department, and particularly OFAC (because of its extensive authorities), is spearheading a number of CTF initiatives related to Mexico.

A dedicated USNORTHCOM representative to Treasury, not necessarily exclusively assigned to OFAC, would augment the organization’s analytical capability. The representative would be able to access Treasury’s financial information and help OFAC develop cases for sanctions against the individuals or businesses associated with Mexican TCOs. The USNORTHCOM representative to Treasury would also serve as the representative to the US Department of Homeland Security (DHS) Immigration and Customs Enforcement’s (ICE’s) Trade Transparency Unit (TTU) in the Financial and Trade Investigations Division at headquarters in Washington, DC.

4. Trade Transparency Units

ICE’s Financial and Trade Investigations Division has established TTUs in multiple countries including Mexico, to identify instances and patterns of trade-based money-laundering (TBML), customs fraud, and tax evasion.⁵ These units were created in partnership with key US trading partners to collect and analyze domestic and foreign trade data. The Mexican TCOs frequently prefer TBML to move narcotics proceeds, so access to Mexico’s TTU data would enhance USNORTHCOM’s CTF analysis.

A USNORTHCOM partnership with ICE’s headquarters unit that manages and collects the TTUs’ data would enable the exchange of financial intelligence not typically accessible to other stakeholders engaged in CTF activities related to Mexico. The trade data are collected under agreements with foreign customs organizations; no other USG agency collects this information unless ICE cross-designates specific agency personnel to do this collection. ICE then uses its data mining systems to analyze the data, for example, from the United States and Mexico, to uncover trade and financial anomalies.

During an interview with JAWP, the ICE Unit Chief recommended developing an engagement strategy with USNORTHCOM, for which a precedent has already been set: structure the strategy based on the USSOCOM model. Other combatant commands and military agencies—including the US Central and Southern Commands and the Defense Intelligence Agency—have come to ICE to learn how the TTUs’ data can support CTF efforts. The benefit of having a dual-hatted USNORTHCOM representative between ICE and

OFAC is that the individual would have access to unique financial data sets that would deepen the command's understanding of the financial infrastructure of the Mexican TCOs.

B. Alternative Entry Points

There may be other CTF stakeholder locations where USNORTHCOM would eventually want to place representatives, such as the Defense Intelligence Agency's Office for Joint Threat Finance Intelligence (JTFI), created by the Secretary of Defense through the Under Secretary of Defense for Intelligence in 2011.⁶ CTF efforts at many other organizations shown in Figure 1 are, however, nascent, and would not provide the command with such broad access to the CTF community.

In addition, if a new CTF entity is established within the US Country Team in Mexico, USNORTHCOM personnel would be essential to support it. The US Defense Attaché (DATT) in Mexico expressed an interest in having a "mission analysis" conducted at the Embassy during JAWP's visit in February 2011.⁷ JAWP suggests sending a small team to the US Embassy in Mexico to identify the priorities of all mission partners, beyond the singular scope of CTF stakeholders. Following the DATT's suggestion would enable USNORTHCOM to (1) ascertain the Country Team's priorities and requirements; (2) understand the command's own ability to provide requested support, particularly for CTF activities against the Mexican TCOs; and (3) be aware of the DATT's priorities and ability to provide requested support.

C. Recommendations

Based on its analysis and discussions with CTF stakeholders, JAWP concludes that allocating USNORTHCOM resources to these four organizations will maximize value for both the stakeholder and the command. Two uniformed USNORTHCOM representatives would be sufficient to support the four organizations identified above, maximizing USNORTHCOM resources. The two representatives should be located in Washington, DC on a permanent-change-of-station basis; each representative would divide his/her time between the two organizations to which they would be assigned. These representatives will—

1. Support the analytical and/or operational activities of the USG CTF stakeholders.
2. Inform these stakeholders about DoD capabilities available to support CTF.
3. Facilitate requests for DoD support.
4. Provide information to the command regarding ongoing CTF operations.
5. Ensure USNORTHCOM broad access to unique financial and other data sources related to the Mexican TCOs.

6. Provide situational awareness on current CTF activities and operations directed against Mexican TCOs; and
7. Maximize USNORTHCOM's opportunity to deepen engagements with other CTF stakeholders.

Through access to unique information sources and datasets, as well as through more broadly engaging the stakeholders, the representatives at these organizations will be well positioned to inform analysts and others at USNORTHCOM about CTF activities and to provide new, exploitable information.

Before placing dedicated personnel at SOD and OFC, the team recommends assigning a representative to both organizations for 90 days in a temporary duty status. This assignment would give USNORTHCOM leadership time to (1) assess the value of providing direct support to SOD and OFC; and (2) understand better the types of individual skills and qualifications required to generate the best return on the command's investment.

While USNORTHCOM channels exist to elicit stakeholder requests for support — such as through command and staff visits to mission partners — the process could be augmented with methods that are not traditionally directed at entities outside of the command. To determine and coordinate resources needed to support CTF stakeholders, JAWP recommends capitalizing on an existing annual process conducted by USNORTHCOM.

Specifically, the Comprehensive Joint Assessment (CJA) Survey⁸ process, directed by the USNORTHCOM Force Structure, Resources, and Assessment Directorate (J8), could be expanded to query mission partners on (1) critical gaps in CTF efforts to counter TCOs; and (2) the types of resources required to maintain or expand these CTF activities. These requests, in turn, could be incorporated into USNORTHCOM's annual CJA report for the Chairman of the Joint Chiefs of Staff. Including CTF stakeholders in the CJA process would be a formalized and inclusive approach to understanding the support they need from USNORTHCOM. Moreover, this would help the command facilitate and prioritize requests for support and would deepen USNORTHCOM's knowledge of inter-agency partners CTF activities.

Notes

- ¹ DoD Directive 5205.14, *DoD Counter Threat Finance (CTF) Policy*, 19 August 2010.
- ² DoD Directive 5205.14, *DoD Counter Threat Finance (CTF) Policy*, 19 August 2010.
- ³ The CTF stakeholders identified in the figure are categorized as components of the defense, intelligence, law enforcement, or policy communities in the USG. The roles, missions, and authorities applicable to the CTF mission vary across the community. In some cases, elements within the parent agency will be members of another community. For example, while the Department of Treasury's Office of Intelligence and Analysis is a member of the US Intelligence Community, OFAC is a law enforcement entity.
- ⁴ OFAC authorities stem from numerous federal laws on embargoes and economic sanctions. For more information on OFAC's authorities to sanction drug traffickers see, *Foreign Narcotics Kingpin Designation Act* (21 U.S.C. '1901-1908, 8 U.S.C. '1182) with related regulations known as the *Foreign Narcotics Kingpin Sanctions Regulations* (31 CFR. Part 598). Also see Executive Order 12978 of 21 October, 1995, *Blocking Assets and Prohibiting Transactions with Significant Narcotics Traffickers* implemented by Narcotics Trafficking Sanctions Regulations at 31 CFR Part 536. For information on the US counter-TCO strategy see, President of the United States, *Strategy to Counter Transnational Organized Crime: Addressing Converging Threats to National Security* (Washington: The White House, July 2011).
- ⁵ Trade-based money laundering is a remittance system that organizations use to make, move, spend, and store illicit profits disguised as legitimate trade.
- ⁶ In January 2011, the Secretary of Defense, through the Under Secretary of Defense for Intelligence directed the Defense Intelligence Agency to consolidate DoD CTF analytical activities under a new entity (JTFI) as part of the DoD Track 4 efficiencies process. The JTFI will provide all-source intelligence to support DoD and broader USG CTF policy, plans, and operations to disrupt adversarial resourcing networks. See the Under Secretary of Defense for Intelligence, *Implementation of Secretary of Defense Efficiency Initiatives: Consolidation of Counter Threat Finance (CTF) Elements*, Memorandum (Washington: Department of Defense, 28 January 2011). It is more likely that the JTFI would send representatives to the various combatant commands versus requiring personnel to join the JTFI.
- ⁷ The DATT used the term "mission analysis" during discussions with JAWP at the US Embassy in Mexico City in February 2011. JAWP interpreted the DATT's recommended tasking as an assessment outside of a traditional "mission analysis" but chose to use DATT's own words in this document. There has been a change of command for the DATT in Mexico since the JAWP visit.
- ⁸ The CJA Survey is an annual process to survey military leaders from Service Chiefs and Combatant Commanders about their ability to meet Title 10 and Unified Command Plan responsibilities, and to support the National Military Strategy within their area of responsibility or functional area. The survey allows commanders to reconcile requests and resources across the Services and Commands and to provide input to their planning processes such as assigning roles and missions and force employment. The survey comprises five parts, including an overview of military resource drivers. See Chairman of the Joint Chiefs of Staff, *Joint Strategic Planning System*, CJCSI 3100.01B, 12 December 2008.

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Appendix B. Abbreviations

AFMLS	Asset Forfeiture and Money Laundering Section (FBI)
ARNORTH	Army North
ASD(SO/LIC&IC)	Assistant Secretary of Defense for Special Operations/ Low Intensity Conflict and Interdependent Capabilities
ATF	(Bureau of) Alcohol, Tobacco, Firearms, and Explosives
AWG	Asymmetric Warfare Group
BCSC	Bulk Cash Smuggling Center (ICE)
C2	command-and-control
CBP	Customs and Border Protection
CIA	Central Intelligence Agency
CJA	Comprehensive Joint Assessment
CN	counternarcotics
CNC	Crime and Narcotics Center
CTF	counter threat finance
DASD(CN>)	Deputy Assistant Secretary of Defense for Counternarcotics and Global Threats
DATT	Defense Attaché
DEA	Drug Enforcement Administration
DIA	Defense Intelligence Agency
DoD	Department of Defense
EPIC	El Paso Intelligence Center
FBI	Federal Bureau of Investigation
FinCEN	Financial Crimes Enforcement Network (Treasury)
FINO	Financial Operations Group (CIA)

G3	Operations (Army)
GoM	Government of Mexico
IAC	Information Analysis Center
IATF	interagency task force
ICE	Immigration and Customs Enforcement
IDA	Institute for Defense Analyses
INL	International Narcotics and Law Enforcement (US State Department)
IRS	Internal Revenue Service
JAWP	Joint Advanced Warfighting Program
JIATF-S	Joint Interagency Task Force – South
JIATF-W	Joint Interagency Task Force – West
JIEDDO	Joint Improvised Explosive Device Defeat Organization
JTFI	(Office of) Joint Threat Finance Intelligence
JTF-N	Joint Task Force – North
JWAC	Joint Warfare Analysis Center
LEA	Law Enforcement Agency
NDIC	National Drug Intelligence Center
NGA	National Geospatial-Intelligence Agency
NGB	National Guard Bureau
NIM for TF	National Intelligence Manager for Threat Finance
NRO	National Reconnaissance Office
NSA	National Security Agency
NSC	National Security Council
NSDD	National Security Decision Directive
NTC	Narcotics and Transnational Crime Support Center
OCDETF	Organized Crime Drug Enforcement Task Force
OFAC	Office of Foreign Asset Control
OFC	Organized Crime Drug Enforcement Task Force (OCEDTF) Fusion Center

OIA	Office of Intelligence and Analysis
ONDCP	Office of National Drug Control Policy
OPAD	Office of Program Analysis and Development
OTFESP	Office of Terrorism Finance and Economic Sanctions Policy
OTFI	Office of Terrorism and Financial Intelligence
SAC	Special Agent in Charge
SOD	Special Operations Division (DEA)
TBML	trade-based money laundering
TC&A	Technical Collection & Analysis
TCO	transnational criminal organization
TEOAF	Treasury Executive Office for Asset Forfeiture
TFOS	Terrorist Financing Operations Section
TFFC	Terror Financing and Financial Crimes
TTU	Trade Transparency Unit
US	United States
USCG	United States Coast Guard
USG	United States Government
US JFCOM	United States Joint Forces Command
USMS	United States Marshals Service
USNORTHCOM	United States Northern Command
USPACOM	United States Pacific Command
USSOUTHCOM	United States Southern Command
USSOCOM	United States Special Operations Command

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