



# ILLICIT FINANCE

## Agencies Could Better Assess Progress in Countering Criminal Activity

Report to the Honorable Sheldon Whitehouse, United States  
Senate

January 2025

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# GAO Highlights

View [GAO-25-106568](#). For more information, contact Triana McNeil at (202) 512-8777 or [McneilT@gao.gov](mailto:McneilT@gao.gov).  
Highlights of [GAO-25-106568](#), a report to the Honorable Sheldon Whitehouse, United States Senate

## ILLICIT FINANCE

### Agencies Could Better Assess Progress in Countering Criminal Activity

#### Why GAO Did This Study

Criminal organizations generate money from illicit activities such as drug and human trafficking and launder the proceeds. Federal agencies investigate illicit activity and have developed several strategies and efforts to combat these crimes.

GAO was asked to review efforts to counter illicit finance activities. This report addresses, among other things, (1) selected agencies' roles and responsibilities in investigating and prosecuting illicit finance activities and (2) the progress made with selected strategies and efforts to counter illicit finance activities.

To address these objectives, GAO reviewed agency documents and data, including those related to eight selected federal strategies and efforts on countering illicit finance activities. GAO compared four of these strategies and efforts—which represent long-range, multiagency undertakings—to selected key practices for evidence-based policymaking and for interagency collaboration.

#### What GAO Recommends

GAO is making four recommendations, including that Treasury collect and assess performance information on implementing the Illicit Finance Strategy, and that the Department of State and U.S. Agency for International Development establish goals and assess progress for implementing the Initiative. Treasury disagreed with the recommendation, State agreed with the intent of the recommendation but believes it already addressed it, and USAID agreed. The National Security Council did not provide comments.

#### What GAO Found

Key federal agencies are responsible for investigating entities involved in illicit finance activities and referring them for federal prosecution. For example, the Federal Bureau of Investigation investigates transnational criminal organizations and associated money laundering efforts. Similarly, Immigration and Customs Enforcement's Homeland Security Investigations conducts investigations of criminal organizations in relation to cross-border movement of people, goods, and money. These federal law enforcement agencies and others often work together in interagency collaborative groups, such as task forces, that coordinate investigations of transnational organized crime, money laundering, and major drug trafficking networks. The Department of Justice prosecutes defendants accused of committing federal crimes, including those related to illicit finance.

Federal agencies are taking actions to implement selected government-wide strategies and efforts to counter illicit finance activities, but progress in implementation is not measured in some instances. In these cases, the strategies and efforts do not all have clearly defined goals, and lead agencies or entities do not regularly collect and assess relevant performance information tied to goals. For example, in the 2024 *National Strategy for Combating Terrorist and Other Illicit Financing* (Illicit Finance Strategy), the Department of the Treasury lists over 120 benchmarks (or

goals) that agencies are generally implementing. However, Treasury does not collect and assess performance information from the implementing agencies to determine their progress against the goals. Similarly, entities leading the *Presidential Initiative for Democratic Renewal* (Initiative)—a set of policy and foreign assistance efforts to fight corruption, among other things—have not set joint performance goals or assessed whether agencies are achieving the goals. Such goals and assessments of performance information could help collaborating agencies ensure accountability for common outcomes and inform decisions, which would be in line with leading practices for evidence-based policymaking and interagency collaboration.

**Extent That Selected Federal Strategies and Efforts Related to Countering Illicit Finance Activities Have Goals and Performance Information is Collected**

Strategy or effort	Lead agency or entity	Government-wide goals are documented or set by lead agency or entity	Lead agency or entity collects and assesses performance information tied to goals
National Drug Control Strategy	Office of National Drug Control Policy	✓	✓
National Strategy for Combating Terrorist and Other Illicit Financing	Department of the Treasury's Office of Terrorist Financing and Financial Crimes	✓	✗
U.S. Strategy on Countering Corruption	White House, coordinated by the National Security Council	✓	✗
Presidential Initiative for Democratic Renewal	National Security Council in consultation with Department of State and United States Agency for International Development	✗	✗

Source: GAO analysis of agency documentation. | GAO-25-106568

Strategy or effort	Lead agency or entity	Government wide goals are documented or set by lead agency or entity	Lead agency or entity collects and assesses performance information tied to goals
National Drug Control Strategy	Office of National Drug Control Policy	Yes	Yes
National Strategy for Combating Terrorist and Other Illicit Financing	Department of the Treasury's Office of Terrorist Financing and Financial Crimes	Yes	No
U.S. Strategy on Countering Corruption	White House, coordinated by the National Security Council	Yes	No
Presidential Initiative for Democratic Renewal	National Security Council in consultation with Department of State and United States Agency for International Development	No	No

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## Abbreviations

AMLA	Anti-Money Laundering Act of 2020
AML/CFT	anti-money laundering/countering the financing of terrorism
CATS	Consolidated Asset Tracking System
DEA	Drug Enforcement Administration
DHS	Department of Homeland Security
DOJ	Department of Justice
EOUSA	Executive Office for United States Attorneys
FBI	Federal Bureau of Investigation
FinCEN	Financial Crimes Enforcement Network
HSI	Homeland Security Investigations
ICE	Immigration and Customs Enforcement
IOC-2	International Organized Crime Intelligence and Operations Center
IRS	Internal Revenue Service
IRS-CI	Internal Revenue Service – Criminal Investigation
MOU	Memorandum of Understanding
NSC	National Security Council
OCDETF	Organized Crime Drug Enforcement Task Forces
OFAC	Office of Foreign Assets Control
ONDCP	Office of National Drug Control Policy
REPO	Russian Elites, Proxies, and Oligarchs Task Force
TFFC	Office of Terrorist Financing and Financial Crimes
USAID	U.S. Agency for International Development
USCTOC	U.S. Council on Transnational Organized Crime
USPIS	U.S. Postal Inspection Service

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January 16, 2025

The Honorable Sheldon Whitehouse  
United States Senate

Dear Senator Whitehouse:

Transnational criminal organizations use illicit activities such as human or drug trafficking or cyber fraud to generate money.<sup>1</sup> In many cases, these groups will launder the money they make to facilitate, conceal, and promote their crimes, which can distort markets and the broader financial system. The United States is particularly vulnerable to all forms of illicit finance because of the size of the U.S. financial system and centrality of the U.S. dollar in global trade.<sup>2</sup>

A number of federal departments including the Departments of Justice (DOJ), Homeland Security (DHS) and the Treasury, either individually or as part of collaborative groups, are charged with combating entities that conduct money laundering activities. The federal government has also developed strategies, executive orders, task forces, and other efforts in recent years aimed at countering illicit finance activities. For example, the *National Strategy for Combating Terrorist and Other Illicit Financing* guides U.S. government efforts to address the most significant illicit finance threats and risks to the U.S. financial system.<sup>3</sup>

You asked us to review how the federal government investigates illicit finance activities, achieves goals, and collaborates to counter these activities and criminal networks. This is our second report responding to your request.<sup>4</sup> This report addresses (1) selected agencies' roles and responsibilities in investigating and prosecuting entities involved in illicit finance activities; (2) the progress made with selected strategies and efforts to counter illicit finance activities; (3) the extent to which selected law enforcement and intelligence agencies collaborate with federal and foreign entities to counter illicit finance activities; and (4) the availability of agency and government-wide estimates of resource and workforce needs to counter illicit finance.

To inform our work, we reviewed the following six agencies: Federal Bureau of Investigation (FBI), Drug Enforcement Administration (DEA), Immigration and Customs Enforcement's (ICE) Homeland Security

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<sup>1</sup>Transnational criminal organizations are groups, networks, and associated individuals who operate transnationally to obtain power, influence, or monetary or commercial gains, wholly or partly by illegal means. They protect their activities through a pattern of crime, corruption or violence through a transnational organization structure and the exploitation of transnational commerce or communication mechanisms.

<sup>2</sup>Department of the Treasury, *2024 National Money Laundering Risk Assessment*, (Washington, D.C.: February 2024). The International Monetary Fund defines illicit financial flows as "the movement of money across borders that is illegal in its source (e.g., corruption, smuggling), its transfer (e.g., tax evasion), or its use (e.g., terrorist financing)." We refer to these activities in this report generally as "illicit finance".

<sup>3</sup>Department of the Treasury, *2024 National Strategy for Combating Terrorist and Other Illicit Financing*, (Washington, D.C.: May 2024).

<sup>4</sup>Earlier this year, we released a report examining other U.S. efforts to combat illicit finance, such as suggestions from financial institutions on how the Financial Crimes Enforcement Network (FinCEN) could enhance the suspicious activity report process. See GAO, *Anti-Money Laundering: Better Information Needed on Effectiveness of Federal Efforts*, [GAO-24-106301](#) (Washington, D.C.: Feb. 8, 2024).

Investigations (HSI), Internal Revenue Service's Criminal Investigation (IRS-CI), U.S. Postal Inspection Service (USPIS), and U.S. Secret Service. We selected these agencies because they were responsible for referring about 75 percent of all money laundering-related cases to federal prosecutors during fiscal years 2018 through 2022, according to the most recent data available at the time of our selections, obtained from the Executive Office for United States Attorneys (EOUSA).<sup>5</sup> In addition to these agencies, we identified five interagency collaborative groups that combat illicit finance and money laundering activities for inclusion in our discussion of roles and responsibilities, as well as for answering our third objective (discussed further below). These collaborative groups are the Organized Crime Drug Enforcement Task Forces (OCDETF) Fusion Center, International Organized Crime Intelligence and Operations Center (IOC-2), DEA Special Operations Division, El Dorado Task Force, and Joint Criminal Opioid and Darknet Enforcement team.<sup>6</sup>

To address our first objective, we reviewed applicable laws and regulations, Congressional Budget Justifications, performance reports, and memoranda of understanding and interviewed officials from our selected agencies and interagency collaborative groups. To identify agencies responsible for prosecuting and assessing penalties against entities conducting illicit financial activity, we leveraged information from a prior GAO report on anti-money laundering and interviewed officials from the Department of Justice.<sup>7</sup>

To address our second objective, we reviewed relevant strategies and efforts and related implementation plans, including those publicly and not publicly available (e.g., documents marked sensitive by agencies).<sup>8</sup> Of these strategies and efforts, we selected four that we characterized as long-range, multiagency undertakings related to countering illicit finance activities. These were the *National Drug Control Strategy*; *National Strategy for Combating Terrorist and Other Illicit Financing*; the *United States Strategy on Countering Corruption*; and the *Presidential Initiative for Democratic Renewal*. In particular, we reviewed these four strategies and efforts to determine whether they contained clearly identifiable goals and information related to assessing

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<sup>5</sup>For this report, we defined "federal money laundering-related statutes" as the following: 18 U.S.C. § 1956, 18 U.S.C. § 1957, 18 U.S.C. § 1960, 31 U.S.C. § 5313, 31 U.S.C. § 5316, 31 U.S.C. § 5324, 31 U.S.C. § 5331, and 31 U.S.C. § 5332. Though the EOUSA data capture the referring agencies for ICE, Internal Revenue Service (IRS), and United States Postal Service at the higher agency level, we focused our review for these agencies on ICE-HSI because it is the principal investigative arm of DHS and ICE and investigates transnational and finance crimes; IRS-CI because it is the law enforcement arm of IRS and investigates federal tax crimes; and USPIS because it is the law enforcement arm of the United States Postal Service, responsible for combating mail fraud, money laundering, and drug trafficking through the mail. In addition, EOUSA data listed "all other Homeland Security" among the top 75 percent of referring agencies (with about 5 percent of cases referred), but the EOUSA data system did not allow for a breakout of the agencies within this category, so we excluded it from our review.

<sup>6</sup>We selected these collaborative groups because they have a mission or purpose that aligns closely with the scope of our review (e.g., combating criminal actions that generate proceeds to be laundered), are operationally focused on investigations or information sharing, and involve a preponderance of the agencies in our scope.

<sup>7</sup>GAO-24-106301.

<sup>8</sup>The strategies and efforts include: *FinCEN Anti-Money Laundering and Countering the Financing of Terrorism National Priorities*; *National Drug Control Strategy*; *National Strategy for Combating Terrorist and Other Illicit Financing*; the *United States Strategy on Countering Corruption*; the *Presidential Initiative for Democratic Renewal*; Task Force KleptoCapture; the Russian Elites, Proxies, and Oligarchs (REPO) Task Force; Imposing Sanctions on Foreign Persons Involved in the Global Illicit Drug Trade, (Exec. Order No. 14059, 86 Fed. Reg. 71,549 (Dec. 15, 2021)); and Establishing the United States Council on Transnational Organized Crime, Exec. Order No. 14060, 86 Fed. Reg. 71,793 (Dec. 15, 2021). Our use of the term "efforts" in this context refers to the Presidential initiative, task forces, and executive orders.

performance tied to these goals.<sup>9</sup> For the selected four strategies and efforts, we then reviewed agency responses and documentation and compared them to key practices for evidence-based policymaking, such as setting goals to identify results, collecting performance information to measure progress, and using that information to assess results and inform decisions. We also compared them to leading practices to enhance interagency collaboration, such as ensuring accountability for common outcomes by monitoring progress toward the outcomes.<sup>10</sup> We further interviewed officials at agencies contributing to or responsible for leading all of the strategies and efforts in our review to better understand the status of their implementation efforts, including performance information for achieving stated goals.<sup>11</sup>

To address the third objective examining law enforcement and intelligence agencies' collaboration to counter illicit finance, we conducted 11 semi-structured group interviews with a nongeneralizable sample of staff from the following collaborative groups: OCDETF Fusion Center, IOC-2, El Dorado Task Force, the Joint Criminal Opioid and Darknet Enforcement team, and Special Operations Division.<sup>12</sup> We developed a question set for the group interviews based on selected key considerations for implementing leading interagency collaboration practices.<sup>13</sup> The information collected during these group interviews and our analysis are not generalizable to all individuals involved in these collaborative groups. However, the views shared during these discussion groups provided insights into how effectively the selected groups facilitated collaboration between members.

To address our fourth objective on agency and government-wide estimates of resource and workforce needs to counter illicit finance, we reviewed documentation and written responses to questions provided by the agencies as applicable. We also interviewed the agencies in our scope about how they estimate workforce and resource needs related to illicit finance activities. We further interviewed selected agency officials regarding their workforce estimation processes.

See appendix I for additional information on our scope and methodology.

We conducted this performance audit from January 2023 to January 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>9</sup>For the *National Drug Control Strategy*, we reviewed our prior work in which we found that the Strategy fully met its statutory requirements related to comprehensive, long-range, quantifiable goals, and targets to accomplish those goals. For more information, see GAO, *Drug Control: Office of National Drug Control Policy Met Some Strategy Requirements but Needs a Performance Evaluation Plan*, [GAO-23-105508](#) (Washington, D.C.: Dec. 19, 2022).

<sup>10</sup>GAO, *Evidence-Based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts*, [GAO-23-105460](#) (Washington, D.C.: July 12, 2023). In addition, see GAO, *Government Performance Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges*, [GAO-23-105520](#) (Washington, D.C.: May 24, 2023).

<sup>11</sup>Specifically, we interviewed officials from lead agencies which include Department of the Treasury's Office of Terrorist Financing and Financial Crimes; Department of the Treasury's Office of Foreign Assets Control; Department of State; United States Agency for International Development; Department of Justice's Office of the Deputy Attorney General; and U.S. Council on Transnational Organized Crime.

<sup>12</sup>We also interviewed staff from the KleptoCapture and REPO Task Forces. Because these task forces are part of the efforts discussed in our second objective, we presented information gained from these interviews in that section of the report. The interviewees included 46 supervisory and nonsupervisory officials from DEA, FBI, HSI, IRS-CI, OCDETF, Treasury, USPIS, and Secret Service.

<sup>13</sup>[GAO-23-105520](#).

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## Background

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### Federal Agencies Involved in Countering Illicit Financial Activity

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Various federal law enforcement agencies have responsibilities related to detecting illicit financial activity and conducting investigations of money laundering and related violations.<sup>14</sup> For example:

- DOJ investigates and prosecutes violations of federal criminal law, including money laundering statutes. Within DOJ, the DEA and FBI investigate drug trafficking and transnational criminal organizations and their money laundering activities. The FBI also gathers intelligence related to these and other federal crimes and threats to national security. Upon conviction of a federal criminal offense, district courts may impose statutory fines and other penalties, including terms of imprisonment. In addition, courts may impose restitution and the government may forfeit assets seized by law enforcement.
- Within DHS, U.S. ICE's Homeland Security Investigations (HSI) component targets transnational criminal organizations, and agents investigate money laundering, illicit finance, and other financial crimes related to how those organizations receive, move, launder, and store their illicit funds. The Secret Service also targets transnational criminal organizations engaged in illicit finance, cybercrimes, counterfeiting, and money laundering involving financial institutions and payment systems.
- Within the Department of the Treasury (Treasury), IRS-CI investigates complex and significant money laundering activity, including activities related to terrorism financing and transnational organized crime.<sup>15</sup>
- Law enforcement task forces and collaborative groups, such as OCDETF—part of DOJ—and the El Dorado Task Force, led by HSI, conduct illicit finance investigations. These task forces investigate transnational criminal organizations and seek to dismantle the financial networks that support them.

In addition, Treasury and its Financial Crimes Enforcement Network (FinCEN) are charged with enforcing the Bank Secrecy Act and its implementing regulations to combat money laundering and other criminal financial activity. The Bank Secrecy Act, as amended, and its implementing regulations require financial institutions to monitor customer transactions to identify suspicious activity that may indicate money laundering or other criminal activity.<sup>16</sup> The Anti-Money Laundering Act of 2020 (AMLA) was enacted in January 2021, in part, to modernize the anti-money laundering/countering the financing of terrorism (AML/CFT) regulatory framework.<sup>17</sup> AMLA charges the Secretary of the Treasury or FinCEN Director with various implementation responsibilities.

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<sup>14</sup>For more information on how criminal entities launder illicit proceeds in the United States, see [GAO-24-106301](#).

<sup>15</sup>In addition, Treasury's Office of Foreign Assets Control administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against various parties that threaten the security or economy of the United States.

<sup>16</sup>31 U.S.C. § 5318(g) and 31 C.F.R. § 1010.320, referencing 31 C.F.R. §§ 1020.320, 1021.320, 1022.320, 1023.320, 1024.320, 1025.320, 1026.320, 1029.320, and 1030.320. Money laundering generally is the process of making proceeds from illicit activities appear to be funds and assets with legitimate sources. See, e.g., 18 U.S.C. §§ 1956-57 (criminalizing the laundering of monetary instruments).

<sup>17</sup>AMLA was enacted as Division F, §§ 6001-6511 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Pub. L. No. 116-283, 134 Stat. 3388, 4547-4633 (2021). The Joint Explanatory Statement for the National Defense Authorization Act, 2021, noted that the current U.S. AML/CFT framework is grounded in the Bank Secrecy Act, first passed in 1970, and the regime is generally built around mechanisms that contemplate aging, decades-old technology. AMLA represents a comprehensive update to this framework. H.R. Conf. Rep. No. 116-617, at Division F (2020).

To address one particular AMLA requirement, in June 2021, FinCEN issued the first government-wide AML/CFT national priorities list, which is intended to help financial institutions prioritize compliance resources and risk management in relation to current threats.<sup>18</sup> According to FinCEN, the priorities, in no particular order, are (1) corruption; (2) cybercrime, including relevant cybersecurity and virtual currency considerations; (3) foreign and domestic terrorist financing; (4) fraud; (5) transnational criminal organization activity; (6) drug trafficking organization activity; (7) human trafficking and human smuggling; and (8) proliferation financing.<sup>19</sup>

In February 2024, we reported on FinCEN's efforts in implementing various provisions of the Bank Secrecy Act and AMLA, as well as federal data collection on the outcomes of illicit finance investigations.<sup>20</sup> We found that FinCEN had not provided Congress and the public with a full picture of its progress in implementing all sections of AMLA for which it has implementation responsibilities. We also found that it was difficult to determine total outcomes of illicit finance investigations across the federal government because monitoring and data collection were fragmented across individual agencies.

We recommended, among other things, that FinCEN develop and implement a plan to inform Congress and the public about its progress in implementing AMLA, and that the Attorney General coordinate with DHS and Treasury to develop a methodology for producing government-wide data on the outcomes of anti-money laundering investigations. FinCEN did not comment on these recommendations at the time our report was issued, but in September 2024, noted that it agreed with recommendations directed to the agency and was taking actions to implement them. DOJ agreed with the recommendation for the Attorney General and informed us in November 2024 that it is taking steps to implement it. We will continue to monitor the status of agency efforts to implement these recommendations.

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## Federal Strategies and Efforts to Combat Illicit Finance Activities

In addition to law enforcement responsibilities to detect illicit finance activity and conduct investigations, several strategies and efforts<sup>21</sup> exist to combat illicit finance activities, such as those involving terrorism, corruption, transnational crime, and the actions of kleptocracies.<sup>22</sup> The national strategies are intended to holistically address these issues among multiple agencies, while other efforts are more targeted approaches to specific issues, such as the sanctioning of foreign individuals or freezing of Russian assets. Table 1

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<sup>18</sup>Financial Crimes Enforcement Network, *Anti-Money Laundering and Countering the Financing of Terrorism National Priorities* (Vienna, Va.: June 30, 2021).

<sup>19</sup>AMLA also requires the Secretary of the Treasury, acting through the Director of FinCEN, to promulgate regulations, as appropriate, for financial institutions to incorporate these priorities into their risk-based AML/CFT programs. 31 U.S.C. § 5318(h)(4)(D). On July 3, 2024, FinCEN published a notice of proposed rulemaking that would require financial institutions to review government-wide AML/CFT priorities and incorporate them, as appropriate, into risk-based programs, as well as provide for certain technical changes to program requirements. Anti-Money Laundering and Countering the Financing of Terrorism Programs, 89 Fed. Reg. 55,428 (proposed July 3, 2024).

<sup>20</sup>See [GAO-24-106301](#).

<sup>21</sup>Our use of the term “efforts” in this context refers to a Presidential initiative, executive orders, and task forces.

<sup>22</sup>Kleptocracy refers to a form of government corruption that entails the systematic use of the government’s powers to enrich political leaders.

summarizes the purpose of each strategy and effort and identifies lead agencies responsible for overseeing their implementation.<sup>23</sup>

**Table 1: Summary of Selected U.S. Strategies and Efforts Related to Combating Illicit Finance Activities**

Strategy or effort	Lead agencies	Summary
<i>National Drug Control Strategy<sup>a</sup></i>	Office of National Drug Control Policy	Sets forth a government-wide plan to reduce illicit drug use and its consequences in the U.S. by limiting the availability of drugs. The strategy aims to reduce the demand for drugs and promote prevention, early intervention, treatment, and recovery support. The disruption of illicit finance networks is one focus area of this strategy.
<i>National Strategy for Combating Terrorist and Other Illicit Financing<sup>b</sup></i>	Department of the Treasury's Office of Terrorist Financing and Financial Crimes	Intended to guide efforts to address the most significant illicit finance threats and risks to the U.S. financial system. The response includes efforts to modernize the U.S. anti-money laundering/countering the financing of terrorism regime so that the public and private sectors can effectively focus resources against the most significant illicit finance risks.
<i>United States Strategy on Countering Corruption</i>	White House, coordinated by the National Security Council	Lays out an approach for how the U.S. will work domestically and internationally to prevent, limit, and respond to corruption and related crimes. This strategy places special emphasis on the transnational challenges posed by corruption.
<i>Presidential Initiative for Democratic Renewal</i>	National Security Council in consultation with Department of State and United States Agency for International Development	Focuses on strengthening democracy, defending against authoritarianism, fighting corruption, and promoting human rights. It is comprised of policy and foreign assistance initiatives that support democracy and defend human rights with like-minded governmental and non-governmental partners.
Task Force KleptoCapture	Department of Justice's Office of the Deputy Attorney General	An interagency law enforcement task force dedicated to enforcing sanctions, export restrictions, and economic countermeasures that the U.S. has imposed, along with allies and partners, in response to Russia's military invasion of Ukraine.
Russian Elites, Proxies, and Oligarchs Task Force	Department of Treasury's Office of Foreign Assets Control	Uses its authorities in concert with other appropriate national ministries to collect and share information to take concrete actions, including sanctions, asset freezing, and civil and criminal asset seizure, and criminal prosecution. This task force works to ensure the effective, coordinated implementation of the group's collective financial sanctions relating to Russia, as well as assistance to other nations to locate and freeze assets located within their jurisdictions.
Expansion of Treasury authorities to impose sanctions on foreign persons involved in the global illicit drug trade <sup>c</sup>	Department of Treasury's Office of Foreign Assets Control	Executive Order 14059 declared a national emergency to address international drug trafficking—including the production, global sale, and widespread distribution of illegal drugs; the rise of extremely potent drugs such as fentanyl; as well as the growing role of internet-based drug sales. This Executive Order authorizes the Secretary of Treasury to impose sanctions on foreign individuals involved in the illicit drug trade.
Establishment of the United States Council on Transnational Organized Crime <sup>d</sup>	U.S. Council on Transnational Organized Crime	Established by Executive Order 14060, the U.S. Council on Transnational Organized Crime is to monitor the production and implementation of coordinated strategic plans for whole-of-government efforts to counter transnational organized crime. This is to be done in support of and in alignment with policy priorities established by the President through the National Security Council.

<sup>23</sup>When discussing these strategies and efforts, "lead agencies" refer to the Office of National Drug Control Policy, Departments of Justice, State and Treasury, USAID, and the U.S. Council on Transnational Organized Crime, as well as the National Security Council and the White House. These agencies or entities are responsible for coordinating the implementation of a strategy or effort. Lead agencies coordinate or consult with various agencies responsible for implementing key aspects of each strategy or effort and specific to their mission. Furthermore, lead agencies may collect progress updates from the implementing agencies and may report this progress information to the public.

Source: GAO summary of agency documentation. | GAO-25-106568

<sup>a</sup>21 U.S.C. § 1705.

<sup>b</sup>See Pub. L. No. 115-44, §§ 261, 262, 131 Stat. 886, 934-36.

<sup>c</sup>Exec. Order No. 14059, 86 Fed. Reg. 71,549 (Dec. 15, 2021).

<sup>d</sup>Exec. Order No. 14060, 86 Fed. Reg. 71,793 (Dec. 15, 2021).

# Federal Agencies Have Various Roles and Responsibilities in Investigating and Prosecuting Entities Involved in Illicit Finance Activities

## Selected Agencies Conduct Investigations as Part of Their Role in Countering Illicit Finance Activities

Multiple federal law enforcement agencies investigate illicit finance, among other crimes, and related money laundering. For example, the FBI is charged with enforcing over 200 categories of federal laws, which include investigations of transnational crime and financial crimes.<sup>24</sup> As another example, Secret Service investigates cybercrimes, counterfeiting, and fraud and money laundering involving financial institutions and payment systems.<sup>25</sup> Table 2 below provides more information on selected federal agencies’ roles in countering illicit financial activities.

**Table 2: Responsibilities of Selected Federal Law Enforcement Agencies in Countering Illicit Financial Activities**

Agency	Relevant responsibilities
Federal Bureau of Investigation (FBI)	The FBI is responsible for collecting intelligence and conducting investigations into federal crimes and threats to the national security of the U.S. <sup>a</sup> It investigates transnational criminal organizations and their money laundering efforts, among other things.
Drug Enforcement Administration (DEA)	DEA is responsible for enforcing U.S. controlled substances laws and regulations. <sup>b</sup> As part of its investigations, DEA attempts to disrupt or dismantle targeted drug organizations, which includes impeding or destroying the organizations’ financing or financial base.
U.S. Immigration and Customs Enforcement’s (ICE) Homeland Security Investigations (HSI)	ICE is responsible for enforcing federal laws governing border control, customs, trade, and immigration. HSI has legal authority to conduct federal criminal investigations into the illegal cross-border movement of people, goods, money, technology, and other contraband. It also has the legal authority to investigate certain cybercrimes, virtual currency crimes, the financial integrity of financial institutions, money laundering, and kleptocracy. HSI combats transnational criminal enterprises that seek to exploit legitimate trade, travel, and financial systems.
United States Secret Service (Secret Service)	The Secret Service is responsible for enforcing laws governing the U.S. financial and payment systems. This includes legal authority to investigate certain financial crimes, including crimes targeting financial institutions and payment systems, counterfeiting of U.S. obligations, bank fraud, money laundering, and other unlawful activity involving financial transactions. The Secret Service also has authority to investigate certain cybercrimes, such as unauthorized access to computers and systems and the resulting money laundering. <sup>c</sup>
Internal Revenue Service’s Criminal Investigation (IRS-CI)	IRS-CI is responsible for enforcing criminal statutes relating to violations of internal revenue laws and other financial crimes. IRS-CI investigates cases of fraud involving both legal and illegal sources of income. Its cases include violations of tax laws, mortgage fraud, and money laundering, as well as the profits and financial gains of organized crime groups involved in narcotics and money laundering.

<sup>24</sup>See 28 C.F.R. § 0.85.

<sup>25</sup>18 U.S.C. § 3056.

Agency	Relevant responsibilities
U.S. Postal Inspection Service (USPIS)	USPIS is the law enforcement arm of the U.S. Postal Service. Its responsibilities include monitoring the flow of bulk cash seized in the mail and interdicting and investigating illicit drugs and their proceeds, as well as firearms, trafficked through the U.S. mail.

Source: GAO analysis of information from the agencies listed above. | GAO-25-106568

Note: The agencies in this table represent over 75 percent of all money laundering-related cases referred to federal prosecutors from fiscal year 2018 through fiscal year 2022. We obtained the data used to make this determination from the Executive Office for United States Attorneys.

<sup>a</sup>See 28 C.F.R. § 0.85.

<sup>b</sup>Reorganization Plan No. 2 of 1973, Exec. Ord. No. 11,727, 38 Fed. Reg. 18,357 (July 10, 1973).

<sup>c</sup>18 U.S.C. §§ 1030 and 3056.

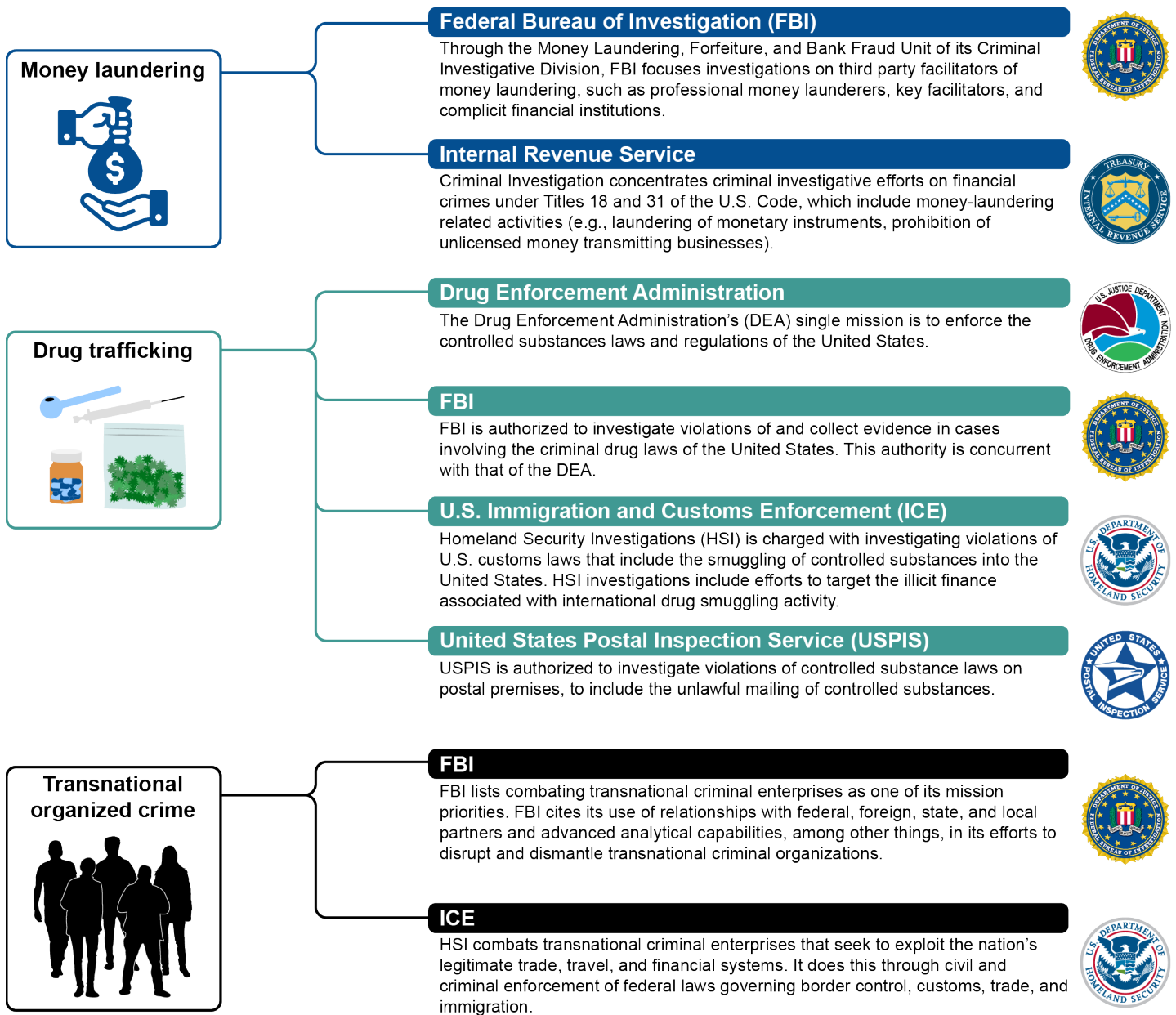
Some of these agencies track and report performance measures on illicit finance cases and high-priority organizations that have been disrupted or dismantled.<sup>26</sup> See appendix II for selected examples of these data.

Each of the agencies above is responsible for investigating potential violations of specified federal laws, such as DEA’s enforcement of controlled substances laws and regulations under Title 21 of the United States Code and Code of Federal Regulations.<sup>27</sup> In addition, some agencies are authorized to investigate potential violations of the same or similar laws. Figure 1 provides an illustration of some of these similar responsibilities.

<sup>26</sup>For OCDETF and DEA, high-priority targets are those on the Attorney General’s consolidated priority organization target list, comprising leaders of the most prolific transnational criminal organizations. HSI also tracks this metric specifically for high-threat transnational criminal organizations engaged in criminal activity related to illicit trade, travel, or finance.

<sup>27</sup>Reorganization Plan No. 2 of 1973, Exec. Ord. No. 11,727, 38 Fed. Reg. 18,357 (July 10, 1973).

**Figure 1: Types of Illicit Finance Activities That Selected Agencies' Investigative Responsibilities May Involve**



Source: GAO review of agency documentation; GAO graphics (drug trafficking items); Icons-Studio/stock.adobe.com (money laundering and transnational organized crime icons). | GAO-25-106568

In addition to individual agencies' investigations, multiagency investigations are conducted or supported through collaborative groups such as the OCDETF Fusion Center and the IOC-2. These groups serve to share information among participating agencies and coordinate and deconflict investigations, among other things, as shown in table 3. See appendix III for more information on these collaborative groups' missions and participating agencies.

**Table 3: Missions of Selected Collaborative Groups That Conduct or Support Illicit Finance and Money Laundering Investigations**

Collaborative group	Mission	Lead Agency
Organized Crime Drug Enforcement Task Forces (OCDETF)	OCDETF, an independent component within the Department of Justice (DOJ), uses a prosecutor-led, multiagency approach to lead coordinated investigations of transnational organized crime, money laundering, and major drug trafficking networks.	DOJ
OCDETF Fusion Center	The OCDETF Fusion Center is a data center that manages drug and related financial intelligence information from OCDETF's partner investigative agencies and other partners to create intelligence pictures of targeted organizations, among other things.	OCDETF
El Dorado Task Force	The El Dorado Task Force is an anti-money laundering task force consisting of numerous law enforcement agencies—including federal agents; international, state, and local police investigators; intelligence analysts; and federal prosecutors—located at Immigration and Customs Enforcement's (ICE) Homeland Security Investigations (HSI) field offices. <sup>a</sup>	ICE HSI
International Organized Crime Intelligence and Operations Center (IOC-2)	IOC-2 creates and disseminates intelligence products to support criminal investigations and prosecutions across the country and is regularly involved in deconfliction and case coordination. <sup>b</sup>	OCDETF
Joint Criminal Opioid and Darknet Enforcement team	This team is a Federal Bureau of Investigations (FBI)-led initiative that supports, coordinates, and assists in deconfliction of investigations targeting the sale of illegal drugs online, especially fentanyl and other opioids.	FBI
Drug Enforcement Administration (DEA) Special Operations Division	The Special Operations Division is a DEA-led, multiagency operational coordination center aimed at dismantling drug trafficking and terrorist organizations by attacking their command, control, and communications.	DEA

Source: GAO analysis of information provided by each of the lead agencies listed above. | GAO-25-106568

<sup>a</sup>The first El Dorado Task Force was formed in HSI's New York office. ICE officials have informed us that during the course of our review, the El Dorado Task Force model has been implemented at all 30 HSI field offices with a Special Agent in Charge throughout the U.S.

<sup>b</sup>IOC-2 and OCDETF Fusion Center officials have noted that when each entity was stood up, the OCDETF Fusion Center focused more on supporting drug trafficking investigations, with IOC-2 focused more on transnational organized crime. However, over time the OCDETF Fusion Center's mission has expanded to include more transnational organized crime-related investigations. The officials stated that the two groups are working together to better delineate their separate responsibilities.

**DOJ Prosecutes Defendants Charged with Violating U.S. Anti-Money Laundering Laws**

Federal prosecutors in DOJ are generally responsible for prosecuting defendants accused of violating U.S. anti-money laundering and other federal laws.<sup>28</sup> Federal law enforcement agencies, upon determining that they have obtained sufficient evidence to pursue prosecution, may refer such cases to federal prosecutors in DOJ for prosecution or collaborate with federal prosecutors to develop cases that are appropriate for prosecution. See appendix II for data on money laundering-related charges referred to federal prosecutors, convictions, and sentence lengths for defendants found guilty from fiscal year 2019 through fiscal year 2023.<sup>29</sup>

<sup>28</sup>In addition, DOJ's Money Laundering and Asset Recovery Section prosecutes and coordinates complex, sensitive, multi-district, and international money laundering and asset forfeiture investigations and cases, among other things.

<sup>29</sup>In February 2024, we reported that comprehensive, government-wide data on illicit finance investigations do not exist because data collection is fragmented across multiple agencies and data may be incomplete. We recommended that DOJ, in coordination with DHS and Treasury, develop a methodology for producing government-wide data on the outcomes of anti-money laundering investigations. DOJ agreed with the recommendation. See [GAO-24-106301](#).

### Examples of prosecutions and seizures in relation to money laundering-related charges

In August 2022, two defendants were sentenced to 97 months and 36 months incarceration, respectively, and ordered to pay a total of \$12,313,364 in restitution and forfeit \$5 million. These sentences resulted from Organized Crime Drug Enforcement Task Forces' (OCDETF) Operation Five Fingers, a joint investigation into a Nigerian and Ghanaian transnational organized crime group that targeted businesses with email compromise schemes to steal personally identifiable information and proceeds, and then laundered the proceeds. Agencies involved included the Department of Labor Office of Inspector General, Federal Bureau of Investigation, Homeland Security Investigations (HSI), and the U.S. Secret Service.

Source: OCDETF | GAO-25-106568

In December 2023, Ezequiel Alanis Espitia, the leader of a conspiracy carried out on behalf of the Gulf Cartel in Mexico, was sentenced to 27 years in federal prison following a multiagency OCDETF investigation conducted by HSI, the Drug Enforcement Administration, Internal Revenue Service's Criminal Investigation, and the Houston Police Department. Mr. Espitia pled guilty to money laundering and conspiracy to possess with intent to distribute controlled substances. As of his sentencing, 15 other individuals had also been convicted for their roles in the conspiracy. Law enforcement officials seized \$610,400 in drug proceeds during the course of the investigation.

Source: Immigration and Customs Enforcement. | GAO-25-106568

In certain instances, individuals suspected of committing federal criminal offenses, including money laundering-related offenses, may have assets seized for evidence or for forfeiture, or both. Seizure involves the physical restraint of an asset or its transfer from the owner or possessor to the custody or control of the government through a law enforcement agency.<sup>30</sup>

Defendants charged and convicted of money laundering-related offenses or other offenses may be subject to imprisonment and various types of penalties, including:

**Fines:** The U.S. District Courts where cases are tried may order fines for the criminal violations of money-laundering statutes.

**Asset Forfeitures:** This is the taking of property by the government without compensation because of the property's connection to criminal activity. There are three types of asset forfeiture: criminal, civil, and administrative.<sup>31</sup>

Appendix II contains data on fines assessed and assets seized or forfeited in relation to money laundering-related charges from fiscal year 2019 through fiscal year 2023.

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## Agencies' Assessments of Countering Illicit Finance Activities Provide Limited Insights Into Progress

Agencies have multiple strategies and efforts to counter illicit finance activities and are taking actions to implement them. However, progress toward implementing them is not always clear because lead agencies

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<sup>30</sup>Seizure generally occurs incident to an arrest, pursuant to a search, pursuant to a civil or criminal seizure warrant for specific items subject to forfeiture, or pursuant to a preliminary order of forfeiture. Law enforcement often obtains authority for seizures through a search warrant or seizure warrant issued by a federal magistrate and based upon a sworn affidavit that describes in detail the property to be seized and the evidence demonstrating probable cause that the property is subject to seizure and forfeiture.

<sup>31</sup>Criminal forfeiture is part of a criminal prosecution of a defendant. It requires a criminal conviction, and forfeiture of the defendant's interest in property linked to the criminal offense of conviction is part of the defendant's sentence. Civil judicial forfeiture is a court action against property linked to a criminal offense, rather than against the wrongdoer. It does not depend upon criminal proceedings or a criminal conviction. Administrative forfeiture is an administrative agency action against certain types of property linked to a criminal offense, civil in nature but without judicial intervention. Each type of forfeiture is governed by different authorities and practices; however, in all forfeiture cases, the government bears the burden of proving that the property subject to forfeiture is connected to criminal activity.

have not set clearly defined goals or regularly collected and assessed relevant performance information tied to the goals.

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## Agencies Are Taking Actions to Implement Strategies and Efforts to Counter Illicit Finance Activities

Several federal agencies and entities are leading or taking actions to implement eight government-wide strategies and efforts to counter illicit finance activity.<sup>32</sup> These are (1) the *National Drug Control Strategy*; (2) the *National Strategy for Combating Terrorist and Other Illicit Financing*; (3) the *United States Strategy for Countering Corruption*; (4) the *Presidential Initiative for Democratic Renewal*; (5) an expansion of Treasury authorities to impose sanctions on foreign persons involved in the global illicit drug trade; (6) the U.S. Council on Transnational Organized Crime; (7) Task Force KleptoCapture; and (8) the Russian Elites, Proxies, and Oligarchs (REPO) Task Force.

### National Drug Control Strategy

The *National Drug Control Strategy* is to set forth a comprehensive plan to (1) reduce illicit drug use in the U.S. by limiting the availability of, and reducing the demand for, illegal drugs and (2) promote prevention, early intervention, treatment, and recovery support for individuals with substance use disorders.<sup>33</sup> The Office of National Drug Control Policy's (ONDCP) mission is to reduce substance use disorder and its consequences by coordinating the nation's drug control policy through the development and oversight of the *National Drug Control Strategy* and National Drug Control Budget.<sup>34</sup> In part, it prioritizes a targeted response to drug traffickers and transnational criminal organizations, includes efforts to strengthen domestic law enforcement cooperation to disrupt the trafficking of illicit drugs within the U.S, and aims to increase collaboration with international partners to disrupt the supply chain of illicit substances and the precursor chemicals used to produce them.

In May 2024, ONDCP released its 2024 *National Drug Control Strategy* and 2024 *National Drug Control Assessment*, which include descriptions of the progress made toward each of the goals and objectives since the 2022 *National Drug Control Strategy*.<sup>35</sup> For example, the 2024 *National Drug Control Strategy* states that progress has been made on advancing efforts to reduce the supply of illicit substances through domestic collaboration and interagency coordination. Such efforts include focusing federal investigations on priority transnational criminal organizations engaged in drug trafficking.

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<sup>32</sup>When discussing these strategies and efforts, "lead agencies" refer to the Office of National Drug Control Policy, Departments of Justice, State and the Treasury, USAID, and the U.S. Council on Transnational Organized Crime, as well as the National Security Council and the White House.

<sup>33</sup>21 U.S.C. § 1705.

<sup>34</sup>21 U.S.C. §§ 1702, 1703, and 1705. The 2022 *National Drug Control Strategy* included three companion documents that direct Federal agencies to take actions to stop the trafficking of drugs across our Caribbean, Northern, and Southwest Borders. The 2024 *National Drug Control Strategy* includes an update to the 2022 Northern, Southwest, and Caribbean Border Counternarcotics Strategies in an appendix.

<sup>35</sup>Pursuant to 21 U.S.C. § 1702(a)(4), ONDCP is required to evaluate the effectiveness of the national drug control policy, including the National Drug Control Program agencies' programs by developing and applying specific goals and performance measurements and monitoring agencies' program-level spending.

### *National Strategy for Combating Terrorist and Other Illicit Financing*

The 2024 *National Strategy for Combating Terrorist and Other Illicit Financing* (Illicit Finance Strategy) identifies steps to increase transparency in the U.S. financial system and strengthen the U.S. anti-money laundering/countering the financing of terrorism (AML/CFT) framework.<sup>36</sup> To accomplish this, the 2024 Illicit Finance Strategy identifies four priorities—derived and continuing from the 2022 Illicit Finance Strategy—to guide U.S. government efforts and address the most significant illicit finance threats and risks to the U.S. financial system. The four priorities are the following:

1. Assess and address legal and regulatory gaps in the U.S. AML/CFT regime
2. Make the U.S. AML/CFT regulatory and supervisory framework for financial institutions more risk-focused and effective
3. Enhance the operational effectiveness of law enforcement and other U.S. government agencies in combating illicit finance
4. Support responsible technological innovation and harness technology to mitigate illicit finance risks

The 2024 Illicit Finance Strategy provides a summary of the progress that the Department of Treasury's (Treasury) Office of Terrorist Financing and Financial Crimes and its federal partners have made toward implementing the 2022 Illicit Finance Strategy. Treasury officials we spoke with said a key goal of the 2022 Illicit Finance Strategy was implementing the Corporate Transparency Act, with the ultimate launch of the Beneficial Ownership Information Registry on January 1, 2024.<sup>37</sup> In addition, since 2022, Treasury has conducted a number of risk assessments identifying significant money laundering and illicit finance threats and vulnerabilities to the United States, which the priorities and supporting actions of the Illicit Finance Strategy are intended to address. See appendix IV for further information on these threats and vulnerabilities.

### *United States Strategy for Countering Corruption*

The 2021 *United States Strategy for Countering Corruption* (Strategy) lays out the U.S. government's approach for working domestically and internationally, with governmental and nongovernmental partners, to prevent, limit, and respond to corruption and related crimes. The Strategy emphasizes the transnational dimensions of the challenges posed by corruption, including by recognizing the ways in which corrupt actors have used the U.S. financial system and other rule-of-law based systems to launder their ill-gotten gains. According to the Strategy, to curb corruption and its effects, the U.S. government will organize its efforts around five mutually reinforcing areas of work: (1) modernizing, coordinating, and resourcing U.S. efforts to fight corruption; (2) curbing illicit finance; (3) holding corrupt actors accountable; (4) preserving and strengthening the multilateral anti-corruption architecture; and (5) improving diplomatic engagement and leveraging foreign assistance.

In 2023, the White House released two reports that described agencies' efforts toward implementing the Strategy, organized according to its five areas of work. For example, Treasury advanced efforts to implement

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<sup>36</sup>Released in May 2024, Treasury's *2024 National Strategy for Combating Terrorist and Other Illicit Financing* is the latest in a series of such strategies, with the prior version being released in May 2022.

<sup>37</sup>The Corporate Transparency Act, Pub. L. No. 116-283, 134 Stat. 4604, 4604-25, which is part of AMLA, requires that certain businesses report information on their beneficial owners to FinCEN and requires FinCEN to maintain the information in a nonpublic database. For more information on Treasury's efforts to implement the Corporate Transparency Act and the broader AMLA of 2020, see [GAO-24-106301](#).

the Corporate Transparency Act and prevent criminals from using shell and front companies to launder illicit proceeds by issuing a final rule that requires certain entities to report information about their beneficial owners to FinCEN.<sup>38</sup> In addition, the State Department and the U.S. Agency for International Development (USAID) launched a Financial Transparency and Integrity Democracy Cohort to spur action and encourage implementation of commitments to prevent corruption. Also related to the Strategy, in 2024, FinCEN issued final rules intended to help safeguard the residential real estate and investment adviser sectors from illicit finance.<sup>39</sup>

### *Presidential Initiative for Democratic Renewal*

In 2021, the White House announced the establishment of the *Presidential Initiative for Democratic Renewal* (Initiative), a set of policy and foreign assistance efforts that are intended to build upon the U.S. government's ongoing work to bolster democracy and defend human rights globally. According to the announcement, the Initiative centers on five areas of work related to the functioning of transparent, accountable governance: (1) supporting free and independent media; (2) fighting corruption; (3) bolstering democratic reformers; (4) advancing technology for democracy; and (5) defending free and fair elections and political processes.

From 2022 to 2024, the White House released annual reports that described agencies' efforts toward implementing the Initiative, organized according to the five areas of work. For example, related to the fighting corruption area of work, the U.S. government and its foreign partners announced in 2023 the Summit for Democracy Commitment on Beneficial Ownership and Misuse of Legal Persons. The goal of the commitment is to enhance beneficial ownership transparency to make it more difficult for corrupt actors to conceal their identities, assets, and criminal activities. USAID assigned the Bureau for Democracy, Human Rights, and Governance to further implement key aspects of the Initiative. In addition, State appointed a Coordinator on Global Anti-Corruption to strengthen international coordination on anti-corruption issues and advance U.S. anti-corruption priorities.

### Expansion of Treasury Authorities to Impose Sanctions on Foreign Persons Involved in the Global Illicit Drug Trade

In December 2021, the White House declared a national emergency to address international drug trafficking and authorized the Secretary of the Treasury to impose sanctions on foreign individuals involved in the illicit drug trade.<sup>40</sup> Treasury's Office of Foreign Assets Control (OFAC) administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals. These sanctions are targeted to certain foreign countries and regimes, terrorists, international narcotics traffickers, and other threats. According

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<sup>38</sup>According to FinCEN, beneficial ownership information refers to identifying information about the individuals who directly or indirectly own or control a company. For more information, see Beneficial Ownership Information Reporting Requirements, 87 Fed. Reg. 59,498 (codified at 31 C.F.R. § 1010.380) (2022).

<sup>39</sup>Anti-Money Laundering Regulations for Residential Real Estate Transfers, 89 Fed. Reg. 70,258 (Aug. 29, 2024), and Financial Crimes Enforcement Network: Anti-Money Laundering/ Countering the Financing of Terrorism Program and Suspicious Activity Report Filing Requirements for Registered Investment Advisers and Exempt Reporting Advisers, 89 Fed. Reg. 72,156 (Sept 4, 2024).

<sup>40</sup>The White House declared the national emergency in Executive Order No. 14059, *Imposing Sanctions on Foreign Persons Involved in the Global Illicit Drug Trade*, 86 Fed. Reg. 71,549 (Dec. 17, 2021).

to a White House report, the new authorities build on two decades of sanctions imposed pursuant to the Foreign Narcotics Kingpin Designation Act and implements, in part, the Fentanyl Sanctions Act.<sup>41</sup>

In response to the national emergency declaration, Treasury has submitted four reports to Congress detailing actions OFAC has taken to sanction foreign individuals and entities involved in the illicit drug trade. According to the four reports, which covered the period from December 15, 2021, to October 23, 2023, OFAC closed 12 licensing cases and received reports on blocking 119 transactions or accounts pursuant to the expanded sanction authorities.<sup>42</sup> The blocked transactions or accounts totaled approximately \$2.758 million. In addition, from January 2022 through December 2023, OFAC reported making 238 total designations—142 individuals and 96 entities—for activities related to the international proliferation or production of illicit drugs.<sup>43</sup>

### U.S. Council on Transnational Organized Crime

Established in December 2021, the U.S. Council on Transnational Organized Crime (USCTOC) brings together six departments and agencies involved in counter-transnational organized crime efforts. This council facilitates information sharing and aims to ensure that the U.S. government leverages its tools to counter the threats posed by transnational criminal organizations.<sup>44</sup> According to a White House report, the council is to coordinate government-wide lines of effort to counter transnational organized crime and restructure and enhance the U.S. government's Threat Mitigation Working Group.<sup>45</sup>

USCTOC is to monitor the production and implementation of coordinated strategic plans for whole of government counter-transnational organized crime efforts. The USCTOC strategic division, an interagency working group within DOJ, is responsible for drawing on law enforcement and intelligence community information to produce the coordinated strategic plans that support policy priorities established by the

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<sup>41</sup>Foreign Narcotics Kingpin Designation Act, Pub. L. No. 106-120, 113 Stat. 1626, 1626-36 (1999). Fentanyl Sanctions Act, Pub. L. No. 116-92, 133 Stat. 2261, 2261-75 (2019).

<sup>42</sup>According to the four reports, licensing cases may take the form of specific licenses, license amendments, return-without-action letters, general information letters, interpretive guidance letters, denial letters, closed without determination letters, or withdrawals.

<sup>43</sup>As part of its enforcement efforts, OFAC publishes a list of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. It also lists individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country-specific. Collectively, such individuals and companies are called "specially designated nationals." Their assets are blocked, and U.S. persons are generally prohibited from dealing with them. Of the 238 total designations from January 2022 through December 2023, 156 designations were directed to individuals and entities in Mexico, and 44 designations were directed to individuals and entities in China.

<sup>44</sup>The White House, *Establishing the United States Council on Transnational Organized Crime*, Exec. Order No. 14060; 86 Fed. Reg. 71,793 (Dec. 15, 2021). The Executive Order states that it is the policy of the U.S. to: (a) employ authorized intelligence and operational capabilities in an integrated manner to target, disrupt, and degrade transnational criminal organizations that pose the greatest threat to national security; (b) collaborate with private entities and international, multilateral, and bilateral organizations to combat transnational organized crime (TOC), while also strengthening cooperation with and advancing efforts to build capacity in partner nations to reduce transnational criminal activity; (c) improve information sharing between law enforcement entities and the intelligence community to enhance strategic analysis of, and efforts to counter, transnational criminal organizations and their activities, while also preserving our ability to speedily bring TOC actors to justice; (d) expand tools and capabilities to combat illicit finance, which underpins all TOC activities; and (e) develop and deploy new technologies to identify and disrupt existing and newly emerging TOC threats. According to the USCTOC Charter, issued in 2023, the USCTOC is comprised of representatives from State, Treasury, the Department of Defense, DOJ, DHS, and the Office of the Director of National Intelligence.

<sup>45</sup>The Threat Mitigation Working Group was previously tasked with supporting counter-transnational organized crime efforts under the White House, *Enforcing Federal Law with Respect to Transnational Criminal Organizations and Preventing International Trafficking*, Exec. Order No. 13,773; 82 Fed. Reg. 10,691 (Feb. 9, 2017).

President through the National Security Council.<sup>46</sup> The executive order creating the USCTOC also charged the Director of National Intelligence with providing annual reports to the President assessing the intelligence community's posture with respect to transnational organized crime-related collection efforts. The reports include recommendations on resource allocation and prioritization. The Office of the Director of National Intelligence had provided two such reports as of December 2023.<sup>47</sup>

To date, USCTOC has produced three strategic plans aimed at countering transnational organized crime in specific regions, with one plan focused on countering such crime in Haiti.<sup>48</sup> In the Haiti strategy, it made 21 recommendations to the U.S. government, organized into three lines of effort: (1) investigative actions or judicial outcomes, (2) non-judicial deterrence outcomes, and (3) near-term enhancement of law enforcement posture. One such recommendation stated that the counter-transnational organized crime community should surge intelligence to map Haitian illicit financial networks, with particular emphasis on where within the U.S. financial system the proceeds of crime reside.

In addition to the strategic plans, USCTOC developed a national prioritized list of 71 priority transnational organized crime activities (called "harm activities") and 62 transnational organized crime networks (also referred to as "actors") based on the risk they pose to national security. In 2024, USCTOC further refined this list to identify the top transnational organized crime activities and actors.<sup>49</sup>

### Task Force KleptoCapture

Established in 2022, Task Force KleptoCapture is an interagency law enforcement task force. It is dedicated to enforcing sanctions, export restrictions, and economic countermeasures that the U.S., along with allies and partners, has imposed in response to Russia's military invasion of Ukraine and other malign activity. According to DOJ, the mission of the Task Force includes the following activities:

- Investigating and prosecuting violations of sanctions imposed in response to the Ukraine invasion, as well as sanctions imposed for prior instances of Russian aggression and corruption

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<sup>46</sup>According to DHS officials, the President's *National Security Strategy* is a key document that establishes and communicates policy priorities significant to USCTOC. A second key document that establishes policy priorities is the National Intelligence Priorities Framework, developed by the Intelligence Community to assess and rank various threats. Third, the National Security Council (NSC) communicates policy priorities on a more granular level than contained in the aforementioned strategies and are also reflective of the latest emerging threats and capabilities.

<sup>47</sup>The issued reports are classified and thus not discussed in further detail in this report.

<sup>48</sup>USCTOC, *USCTOC-SD Response to December 22, 2021, Deputies Task in Support of the Haiti Road Map* (U//FOUO//LES). The two additional strategic plans are considered classified, and thus not discussed in this report.

<sup>49</sup>U.S. Council on Transnational Organized Crime Strategic Division, *Transnational Organized Crime Issues and Actors Prioritization Summary* (U//LES//FOUO), March 7, 2024. USCTOC's analysis showed the top harm activities as (in no particular order) cybercrime, drug trafficking and production (especially fentanyl and other synthetic opioids), financial crimes, human smuggling and human trafficking, and weapons trafficking. It also showed the top actors as (in no particular order) Caribbean and Central American transnational criminal organizations, Chinese criminal groups, Mexican transnational criminal organizations, other Asian-Pacific criminal groups, and Southern American transnational criminal organizations.

- Combating unlawful efforts to undermine financial institutions' record-keeping and reporting obligations, including the prosecution of those who try to evade know-your-customer and anti-money laundering measures<sup>50</sup>
- Targeting efforts to use cryptocurrency to evade U.S. sanctions, launder proceeds of foreign corruption, or evade U.S. responses to Russian military aggression
- Using civil and criminal asset forfeiture authorities to seize and forfeit assets belonging to sanctioned individuals or assets identified as the proceeds of unlawful conduct

The Task Force is authorized to investigate and prosecute any criminal offense related to its mission, including conspiracy to defraud the United States by interfering in and obstructing lawful government functions, money laundering, or other offenses. Task Force officials said actions taken to fulfill its mission are dependent on the outcomes of investigations and are often subject to contested litigation.

According to DOJ, as of February 2024, Task Force KleptoCapture has restrained, seized, and obtained judgments to forfeit nearly \$700 million in assets from Russian oligarchs and enablers. Further, they reported charging more than 70 individuals and five corporate entities accused of sanctions evasion, export control violations, money laundering, and other crimes—and arrested more than 30 defendants worldwide.

### Russian Elites, Proxies, and Oligarchs Task Force

Established in 2022, the Russian Elites, Proxies, and Oligarchs (REPO) Task Force is a transatlantic task force that works to ensure the effective implementation of financial sanctions by identifying and freezing the assets of sanctioned individuals and companies that exist within member states' jurisdictions.<sup>51</sup> The Task Force was formed to find, restrain, freeze, seize, and, where appropriate, confiscate or forfeit the assets of those individuals and entities that have been sanctioned in connection with Russia's invasion of Ukraine and the continuing aggression of the Russian regime. According to Treasury officials, the U.S. government is represented on the multilateral REPO Task Force by both the Attorney General and the Secretary of the Treasury, meaning that DOJ and Treasury share lead on REPO Task Force matters. REPO Task Force officials said the Task Force does not measure success in terms of the number of targets or actions but rather the extent to which it has served as a vehicle for members to coordinate efforts. According to Treasury officials, the REPO Task Force continues to leverage financial intelligence, law enforcement information, joint investigations, and the assistance of the private sector to deny Russia access to the revenue streams and economic resources used to wage its war on Ukraine.

In 2023, the REPO Task Force issued a press release that described various achievements since it was established. For example, the REPO Task Force reported that it had blocked or frozen more than \$58 billion worth of sanctioned Russian individuals' assets in financial accounts and economic resources. It also reported ensuring that \$300 billion in Russian Central Bank and Russian National Wealth Fund assets in REPO Task Force members' jurisdictions remain immobilized.

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<sup>50</sup>Know-your-customer measures refer to centralized sources of customer information (e.g., documentation of their licensing or internal controls) that banks can access to conduct their Bank Secrecy Act / Anti-Money Laundering due diligence.

<sup>51</sup>Member states include Australia, Canada, Germany, France, Italy, Japan, the United Kingdom, the United States, and the European Commission.

The REPO Task Force has reported leading and coordinating sanctions enforcement efforts with international partners and counterparts, including detecting and fighting sanctions evasion through joint outreach. In March 2023, the REPO Task Force issued a global advisory on Russian sanctions evasion, which identified certain tactics and issued recommendations to mitigate the risk of exposure to continued evasion. Among these recommendations were ensuring compliance programs implement relevant AML/CFT laws and regulations and are regularly reviewed and taking part in existing public-private partnerships. Treasury officials said the recommendations are intended to be longstanding best practices to reduce sanction evasion. Treasury officials said the agency plans to continue working with the compliance community and related stakeholders to adopt and incorporate them.

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## Selected Strategies and Efforts Lack Performance Information Useful for Assessing Progress

Implementing strategies and efforts to counter illicit finance activities requires federal entities to collaborate with one another to, for example, define outcomes, share information, and assess progress.

According to key practices for evidence-based policymaking, performance management activities help an organization define what it is trying to achieve, determine how well it is performing, and identify what it could do to improve results.<sup>52</sup> Specifically, performance management is a three-step process by which organizations (1) set goals to identify the results they seek to achieve, (2) collect performance information (a type of evidence) to measure progress, and (3) use that information to assess results and inform decisions to ensure further progress toward achieving those goals.<sup>53</sup> For example, performance data that an organization regularly collects and reviews can help determine whether performance goals were met and can help an organization assess progress toward its strategic goals and objectives.<sup>54</sup>

Further, according to leading practices for enhancing interagency collaboration, collaborative efforts between organizations benefit from defining common goals and outcomes. The organizations should then work together to define shared outcomes and goals that are agreed upon by participants. In addition, ensuring accountability of the collaborative effort by assessing its progress toward such defined outcomes is also a leading practice of effective interagency collaboration. This can be done by tracking and monitoring progress of the collaborative mechanism toward these outcomes.<sup>55</sup> If agencies do not use performance information and other types of evidence to assess progress toward outcomes, they may be at risk of failing to achieve their outcomes or show measurable progress toward achieving stated outcomes.

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<sup>52</sup>[GAO-23-105460](#).

<sup>53</sup>Evidence is the available body of facts or information indicating whether a belief or proposition is true or valid consisting of quantitative or qualitative information derived from a variety of sources.

<sup>54</sup>Performance goals are target levels of performance to be accomplished within a time frame. They are generally expressed as tangible, measurable objectives, or as quantitative standards, values, or rates. Strategic goals are outcome-oriented statements of aim or purpose. They articulate what the organization wants to achieve to advance its mission and address relevant problems, needs, challenges, and opportunities. Strategic objectives are the outcomes or impacts the organization is intending to achieve through its various activities. They are usually outcome-oriented to reflect core mission and service-related functions, as well as the breadth of the organization's efforts.

<sup>55</sup>[GAO-23-105520](#).

A number of federal agencies have taken steps to implement selected strategies and efforts to counter illicit finance activities. However, progress toward implementing some of the strategies and efforts cannot be measured because either the strategies and efforts do not have clearly defined goals, or agencies do not regularly collect and assess relevant performance information—or both. In addition, such performance information can help better manage fragmentation among federal agencies by clearly identifying key activities performed and provide opportunities for input and coordination with federal stakeholders.<sup>56</sup> Table 4 describes the extent to which the following strategies and effort, which are long-range, multiagency undertakings related to countering illicit finance activities, have established and defined performance information to be collected and assessed.

**Table 4: Extent that Selected Federal Strategies and Efforts Related to Countering Illicit Finance Activities Have Goals and Performance Information is Collected**

Strategy or effort	Government-wide goals are documented or set by lead agency or entity <sup>a</sup>	Lead agency or entity collects and assesses performance information tied to goals
<i>National Drug Control Strategy</i>	Yes	Yes
<i>National Strategy for Combating Terrorist and Other Illicit Financing</i>	Yes	No
<i>United States Strategy on Countering Corruption</i>	Yes	No
<i>Presidential Initiative for Democratic Renewal<sup>b</sup></i>	No	No

Source: GAO analysis of agency documentation and interviews with agency officials. | GAO-25-106568

Note: When discussing the strategies and efforts in this table, “lead agency or entity” refers to the Office of National Drug Control Policy, Departments of State and Treasury, U.S. Agency for International Development, and the National Security Council and the White House.

<sup>a</sup>We used the term “goals” to refer to a strategy or effort’s unique terminology for establishing desired performance levels.

<sup>b</sup>The Initiative is an effort that defines areas of work for implementing agencies to focus their efforts.

**National Drug Control Strategy**

In December 2022, we reported that the 2022 *National Drug Control Strategy* fully met its statutory requirements related to comprehensive, long-range, quantifiable goals, and targets to accomplish those goals.<sup>57</sup> For example, the *National Drug Control Strategy* was accompanied by the Office of National Drug Control Policy’s (ONDCP) Performance Review System report, which assessed the federal government’s overall progress toward achieving the goals of the Strategy. Another document accompanying the Strategy

<sup>56</sup>Fragmentation refers to those circumstances in which more than one federal agency (or more than one organization within an agency) is involved in the same broad area of national need and opportunities exist to improve service delivery. For more information, see GAO, *2024 Annual Report: Additional Opportunities to Reduce Fragmentation, Overlap, and Duplication and Achieve Billions of Dollars in Financial Benefits*, [GAO-24-106915](#) (Washington, D.C.: May 15, 2024), and *Fragmentation, Overlap, and Duplication: An Evaluation and Management Guide*, [GAO-15-49SP](#) (Washington, D.C.: April 14, 2015).

<sup>57</sup>More than a dozen National Drug Control Program agencies, as identified by ONDCP, have responsibilities for drug prevention, treatment, and law enforcement activities. In addition to ONDCP, these agencies include the departments of Agriculture, Defense, Education, Health and Human Services, Homeland Security, Housing and Urban Development, Interior, Justice, Labor, State, Transportation, Treasury, and Veterans Affairs, as well as AmeriCorps, U.S. Postal Inspection Service, the Court Services and Offender Supervision Agency for the District of Columbia, and the Federal Judiciary, as identified by ONDCP. Within these agencies, there may be components or offices that handle specific aspects of drug control. Some examples include U.S. Centers for Disease Control and Prevention within the Department of Health and Human Services, and the DEA within the Department of Justice. For more information, see [GAO-23-105508](#).

was the *National Drug Control Assessment*, which is a summary of the progress of each National Drug Control Program agency's efforts toward meeting the *National Drug Control Strategy*'s goals. The Assessment summarized agencies' progress using specific performance measures developed and established pursuant to the Strategy.<sup>58</sup>

As stated earlier, in May 2024, ONDCP released its 2024 *National Drug Control Strategy* and 2024 *National Drug Control Assessment*, which include descriptions of the progress made toward each of the goals and objectives since the 2022 *National Drug Control Strategy*. As of November 2024, ONDCP had not yet released its 2024 Performance Review System report that accompanies the 2024 *National Drug Control Strategy*.

### *National Strategy for Combating Terrorist and Other Illicit Financing*

The 2024 Illicit Finance Strategy contains three high-level goals, four priorities (steps to achieve those goals), 15 supporting actions (to support the priorities) and over 120 benchmarks (which we refer to as "goals" for reporting purposes) for progress under each supporting action. Treasury and various other federal agencies are generally responsible for implementing the Illicit Finance Strategy.<sup>59</sup> Treasury's Office of Terrorist Financing and Financial Crimes (TFFC) collects and summarizes actions that agencies have taken to implement the goals in the Illicit Finance Strategy. TFFC officials informed us that they collect this information primarily through formal and informal interaction with agency partners, as well as through participation in other interagency processes (including National Security Council (NSC) meetings and task forces) where countering illicit finance is discussed. The Countering America's Adversaries Through Sanctions Act of 2017 requires that the Illicit Finance Strategy include an assessment of current U.S. efforts to address the highest risks of illicit finance.<sup>60</sup>

While the 2024 Illicit Finance Strategy contains an appendix section that lists and summarizes some actions agencies have taken since the prior Strategy, it does not convey an assessment of whether or not these actions have fully or partially fulfilled the intent of each goal. This is in part because Treasury lacks information from participating agencies to do so. For example, one goal in the 2024 Illicit Finance Strategy is to develop indicators to assess AML/CFT technical assistance outcomes more systematically across the federal government. To help assess whether this goal was fully implemented, Treasury could gather relevant performance information from partner agencies to determine whether agencies are using such indicators. Furthermore, by conducting similar assessments across each goal in the Illicit Finance Strategy and aggregating its findings, Treasury could be better positioned to determine whether agencies have succeeded in

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<sup>58</sup>21 U.S.C. § 1705(g).

<sup>59</sup>The 2024 Illicit Finance Strategy was prepared by Treasury in consultation with DOJ, State, DHS, the Office of the Director of National Intelligence, the Office of Management and Budget, and the staffs of the federal functional regulators. The staff of the federal functional regulators includes staffs of the Commodity Futures Trading Commission; the Federal Deposit Insurance Corporation; the Board of Governors of the Federal Reserve System; the National Credit Union Administration; the Office of the Comptroller of the Currency; and the Securities and Exchange Commission. Since 2018, Treasury has issued an updated Illicit Finance Strategy every 2 years.

<sup>60</sup>The Countering America's Adversaries Through Sanctions Act, Pub. L. No. 115-44, § 262, 131 Stat. 886, 934-36 (2017), requires that the Illicit Finance Strategy include "[a]n assessment of the effectiveness of and ways in which the United States is currently addressing the highest levels of risk of various forms of illicit finance, including those identified in the documents entitled '2015 National Money Laundering Risk Assessment' and '2015 National Terrorist Financing Risk Assessment[.]'"

fully implementing the supporting actions and four priority areas of the Illicit Finance Strategy.<sup>61</sup> Treasury officials also noted that goals (benchmarks) from the prior Illicit Finance Strategy that are considered to be fully addressed by the subsequent Illicit Finance Strategy are removed from the list of benchmarks in the later strategy. By removing or replacing these goals in subsequent strategies and not referencing them, Treasury may miss opportunities to determine or demonstrate overall progress in achieving what it set out to achieve in the current Illicit Finance Strategy.

Treasury officials told us they do not use a formal tracking mechanism to collect performance information on a regular basis. This could impact its ability to assess whether goals are being met. They further told us that Treasury does not have the authority to task other departments or agencies to formally report progress toward goals in the Illicit Finance Strategy. However, Treasury officials also said they would find value in developing a more formal process to obtain performance information related to agencies' efforts to implement the Illicit Finance Strategy. They said this could include developing a quarterly process whereby they obtain more updates that would allow Treasury to regularly update a working document. Given that multiple agencies are tasked with supporting the implementation of the strategy, Treasury could benefit from working with relevant agencies to implement a process for collecting and assessing evidence on the extent to which agencies are achieving the goals outlined in the Illicit Finance Strategy. Doing so could help Treasury better assess the extent to which agencies are meeting goals.

### United States Strategy on Countering Corruption

The 2021 *United States Strategy on Countering Corruption* (Strategy) contains 19 goals, or "strategic objectives," including 76 lines of effort that federal agencies should take to support the goals.<sup>62</sup> Specific to curbing illicit finance, the Strategy contains two goals and 12 lines of effort. These goals are (1) addressing deficiencies in the anti-money laundering regime and (2) working with partners and allies to address these deficiencies.

According to the Strategy, the Biden-Harris Administration is to develop metrics to measure progress against each strategic objective, which will inform an annual report to the President. Federal departments and agencies, coordinated by the NSC and in consultation with the National Economic Council and Domestic Policy Council, are to report annually to the President on progress made against the Strategy's goals. We learned that various agencies implementing the Strategy collect their own performance information independent of NSC, but no government-wide metrics to measure the extent to which progress is being made in implementing the overall strategy have been established or included in the annual reports to the President. For example:

- Some agencies are taking steps to implement the Strategy and collect their own performance information, absent guidance from NSC or specific government-wide target levels or metrics for success in the Strategy. For example, the State Department (State) has developed an implementation plan that includes activities it is taking to address the strategic objectives, broken into anticipated timelines and a description of

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<sup>61</sup>As stated earlier, the four priorities of the 2024 Illicit Finance Strategy are: 1) assess and address legal and regulatory gaps in the U.S. AML/CFT regime; 2) make the U.S. AML/CFT regulatory and supervisory framework for financial institutions more risk-focused and effective; 3) enhance the operational effectiveness of law enforcement and other U.S. government agencies in combating illicit finance; and 4) support responsible technological innovation and harness technology to mitigate illicit finance risks.

<sup>62</sup>The Strategy outlines a whole-of-government approach to elevating the fight against corruption. The White House, coordinated by the NSC, is the primary lead federal entity and works with federal stakeholders including the Departments of Commerce, Defense, Justice, State, Treasury, and USAID to implement the Strategy.

successful “end states” for each activity.<sup>63</sup> Furthermore, agencies such as USAID and State use project-specific performance metrics to inform their assessments of progress on the Strategy. However, these and other agencies do not analyze—in consultation with NSC, the lead entity responsible for collecting and reporting progress information to the President—the extent to which agencies’ collective efforts overall are meeting the goals of the Strategy.

- Some agencies have cited a need for clearer goals or performance metrics in the Strategy. For example, State officials said they would defer to NSC on refining goals for agencies or establishing specific performance metrics, and that developing such metrics could be helpful to gauge progress on the Strategy in the aggregate. In addition, USAID officials said agencies are making progress on implementation, but challenges remain for monitoring and reporting progress against the broad goals in the Strategy, especially across agencies.
- Agencies have taken varied approaches to update NSC on efforts to implement the Strategy. According to DOJ and Treasury officials, they generally provide oral updates to NSC. Treasury officials said they work closely with NSC and other agency partners to advance the Strategy. DOJ officials informed us that there is no written process for reporting their progress. Furthermore, according to USAID officials, NSC initially developed an implementation tracker to collect quarterly updates from agencies about their efforts toward implementing the Strategy. This tracker included information, broken down by the five strategic pillars of the strategy, on ongoing and future actions and timelines for completing actions. USAID officials said NSC now solicits annual updates on highlights of agencies’ significant achievements in addressing the strategic pillars of the Strategy. While USAID has used these updates to provide information on its efforts, the updates, as well as the most recent annual fact sheet on implementation, do not indicate that performance metrics for the Strategy have been developed.

While NSC has submitted annual reports to the President in the form of fact sheets describing agencies’ efforts in implementing the Strategy, as discussed earlier, these reports do not contain metrics measuring progress against the goals. Including such metrics could help NSC and the implementing agencies better measure the extent to which progress is being made against each strategic objective outlined in the Strategy.

### *Presidential Initiative for Democratic Renewal*

USAID and State, in collaboration with bilateral and multilateral partners, are the primary agencies responsible for leading the implementation of the *Presidential Initiative for Democratic Renewal’s* (Initiative) programs.<sup>64</sup> Specifically, according to USAID officials, USAID and other agencies (mainly State) worked closely together to develop the Initiative and its five areas of work through an interagency policy coordination process led by NSC.

We learned that USAID and State generally developed documentation that describes their planning, development, partnering, and implementation of deliverables for individual programs under the Initiative. This includes tracking their own efforts to implement specific programs unique to USAID and State. In addition, USAID and State provide updates to NSC about their efforts to implement the programs. For example, in

<sup>63</sup>Similarly, USAID issued an Anti-Corruption Policy in December 2022, which it uses as the main implementation guidance document for the Strategy.

<sup>64</sup>Specifically, other federal agencies may be involved with specific initiatives, but USAID and State share primary responsibility for administering or coordinating a majority of the initiatives. For example, in March 2023, the U.S. launched a new commitment to enhance beneficial ownership transparency, in line with international standards that require countries to improve the transparency of legal persons, like shell companies, and to prevent their misuse. Classified under the Initiative’s fighting corruption area of work, Treasury takes lead to implement this commitment.

February 2024, USAID provided NSC with a written update for 13 programs that were organized under the Initiative's Fighting Corruption area of work, among others. According to the update, USAID is the lead agency for six of the programs and collected status updates from State and Treasury, which are the lead agencies on the remaining seven programs.

However, neither USAID nor State, in collaboration with NSC, have defined joint, unifying performance goals or developed a method to collect and assess evidence that tracks the extent to which agencies are achieving the goals. For example, lead agencies could develop joint goals that apply to all 13 programs under the Fighting Corruption area of work, such as goals that define successful end states or establish key requirements related to performance. Furthermore, lead agencies could collect and assess relevant performance information tied to such goals, which could help provide insights into the extent to which agencies are improving on this area of work under the Initiative. USAID officials stated they would welcome NSC guidance on high level, joint (e.g., government-wide) outcomes it would like the agency to achieve under the Initiative.

Collecting and assessing such performance information could help agencies focus their efforts to implement various aspects of the Initiative and provide for an overall status of progress toward achieving established performance goals. By working with each other and with NSC to develop and establish joint performance goals, as well as a method to collect and assess performance information tied to them, USAID and State could improve their oversight and tracking of agencies' progress in carrying out the Initiative and could better determine and assess the effectiveness of agencies' efforts.

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## Selected Law Enforcement and Intelligence Groups Are Generally Collaborating to Counter Illicit Finance Activities

The law enforcement and intelligence collaborative groups we reviewed facilitate interagency collaboration to counter illicit finance activities. Collaborative group participants we met with (participants of the Organized Crime Drug Enforcement Task Forces (OCDETF) Fusion Center, the International Organized Crime Intelligence and Operations Center (IOC-2), El Dorado Task Force New York, the Joint Criminal Opioid and Darknet Enforcement team, and Special Operations Division) reported their groups effectively collaborated with federal and foreign entities to counter illicit finance activities, in alignment with leading interagency collaboration practices.<sup>65</sup> These collaborative groups are not directly tied to the government-wide strategies and efforts discussed above, though their efforts may support activities in line with these strategies and efforts. As discussed earlier in this report, various federal agencies provide staff and resources to support these collaborative groups for the purpose of coordinating interagency law enforcement and intelligence activities. In addition, we found that these collaborative groups track outcomes of their activities and have agreements such as memoranda of understanding in place to govern their interactions.

Table 5 presents selected questions we asked participants of these groups and counts of the responses they provided. We presented interviewees' responses on three of the leading collaboration practices for inclusion in

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<sup>65</sup>See Table 3 above for information about each collaborative group's mission and participating agencies. We interviewed 46 selected supervisory and nonsupervisory staff members from across the collaborative groups and asked them questions on selected key considerations for implementation of leading interagency collaboration practices identified in [GAO-23-105520](#). One interviewee provided two sets of responses to our questions—one set of responses on behalf of each of two collaborative groups this interviewee works with—resulting in a total of 47 sets of responses to the interview questions. See appendix I for a full description of methodology.

table 5 to highlight some of the major substantive themes that emerged. For the complete list of questions and responses, see appendix V.

Table 5: Law Enforcement and Intelligence Collaborative Group Participants’ Responses to Selected GAO Questions on Implementation of Leading Interagency Collaboration Practices				
Selected leading interagency collaboration practices	Selected questions asked on implementation of interagency collaboration practices	Very effectively	Somewhat effectively	Not applicable
Ensure Accountability	How effective do you believe your mechanism’s leadership is at ensuring outcomes or objectives are being reached?	44	3	0
Bridge Organizational Cultures	How effectively do you feel that staff from all agencies work together through this mechanism?	46	1	0
Leverage Resources and Information	How effective do you believe your mechanism is at providing you with tools, technologies, or other resources needed to conduct your duties?	35	12	0
	How well would you say information flows through your mechanism, both within the mechanism itself and to and from your agency?	44	3	0
	How effective would you say information sharing is with foreign partners, both inside and outside of your information sharing mechanism?	32	5	10

Source: GAO analysis of comments from selected agency staff. | GAO-25-106568

**Notes:** We interviewed a nongeneralizable sample of 46 supervisory and nonsupervisory staff from eight agencies involved in five law enforcement and intelligence collaborative groups. (In addition to the six agencies in our review—FBI, DEA, ICE-HSI, Secret Service, IRS-CI, and USPIS—we also interviewed certain staff from OCEDEF and Treasury due to the importance of their roles in these collaborative groups). One interviewee provided two sets of responses—one on behalf of each of two collaborative groups in which this interviewee participates—resulting in a total of 47 sets of responses to the interview questions. The interviewees included five El Dorado Task Force participants, seven IOC-2 participants, seven Joint Criminal Opioid and Darknet Enforcement team participants, 17 OCEDEF Fusion Center participants, and 11 Special Operations Division participants. Some interviewees explained that certain questions were not applicable to them in their specific roles, so we recorded their responses as “Not applicable.” We asked one or more questions related to all eight categories of leading interagency collaboration practices identified by GAO in *Government Performance Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges*. [GAO-23-105520](#) (Washington, D.C.: May 24, 2023). The eight categories are: define common outcomes, ensure accountability, bridge organizational cultures, identify and sustain leadership, clarify roles and responsibilities, include relevant participants, leverage resources and information, and develop and update written guidance and agreements. Appendix V presents a full summary of these interview responses. Response categories for these selected questions included 5-point Likert scales regarding effectiveness (very effective, somewhat effective, neither effective nor ineffective, somewhat ineffective, or very ineffective). Since no interviewees provided any of the latter three responses, we present the first two response options (very or somewhat effective) in the table. See appendix I for more details on our methodology.

**Organized Crime Drug Enforcement Task Forces (OCEDEF) Fusion Center and International Organized Crime Intelligence and Operations Center (IOC-2) Use of Intelligence Product Surveys.**

OCEDEF Fusion Center and IOC-2—which both prepare and disseminate intelligence products for field agents—determine the effectiveness of these products through surveys attached to the products. These surveys ask product requestors and recipients four to seven questions about topics such as how well products were tailored to their needs, how satisfied they were with the response, and how they would rate overall product quality. Based on information provided by OCEDEF Fusion Center, in the first quarter of fiscal year 2024, 95 percent of the requestors responding to these evaluation forms rated the products as good to great, and the forms had a response rate of about 24 percent. The response rate for these forms has increased from a response rate of 6.5 percent in fiscal year 2020. OCEDEF officials told us they believe voluntary responses to these feedback forms are more reliable than mandatory responses would be.

Source: OCEDEF. | GAO-25-106568

The following conveys insights and illustrative examples interviewees provided in the areas of ensuring accountability, bridging organizational cultures, and leveraging resources and information in their collaborative groups.<sup>66</sup>

**Ensure Accountability.** GAO has reported that when collaborating entities ensure accountability, such as by communicating progress toward short- and long-term outcomes, they are better able to encourage participation, assess progress, and make necessary changes.<sup>67</sup> Almost all 46 collaborative group interviewees responded that leadership was very effective at ensuring achievement of identified outcomes or objectives. Twelve interviewees from four collaborative groups (OCDETF Fusion Center, El Dorado Task Force, the Joint Criminal Opioid and Darknet Enforcement team, and Special Operations Division) described how their group’s leadership contributed to effective collaboration and communication with various agencies that comprise the group. For example, one interviewee from El Dorado Task Force said their leadership worked effectively to set objectives and outcomes by maintaining partnerships and relationships with participating agencies.

In addition, four interviewees from the Joint Criminal Opioid and Darknet Enforcement team noted benefits of open communication for achieving outcomes. For instance, one interviewee said leadership and program managers worked together to solve problems and develop a vision for the Joint Criminal Opioid and Darknet Enforcement team, as its role had evolved over time. According to one official from the Joint Criminal Opioid and Darknet Enforcement team, the team ensured accountability by leveraging each agency’s unique authority and operational culture because the team offered a good platform for dealing with certain offices that may have different relationships among headquarters or task force components.

Three interviewees within OCDETF Fusion Center stated that its Strategic Management Team—consisting of unit and section chiefs—regularly discussed its process improvements and concerns. Table 6 below provides information on the key outcomes agency officials identified for each collaborative group.

Table 6: Key Outcomes Reported by Selected Participants of Collaborative Groups Involved in Combating Illicit Finance	
Collaborative group	Key outcomes
Organized Crime Drug Enforcement Task Forces (OCDETF) Fusion Center	In fiscal year 2023, OCDETF Fusion Center reported that it disseminated a total of 14,123 intelligence products prepared by participating analysts. These products were disseminated to 46,675 law enforcement personnel in the United States and internationally. Of these products, OCDETF Fusion Center reported that 4,141 were created by OCDETF Fusion Center intelligence analysts and disseminated to 36,693 law enforcement personnel. <sup>a</sup> See sidebar for additional information about these intelligence product disseminations.
International Organized Crime Intelligence and Operations Center (IOC-2)	In fiscal year 2023, IOC-2 produced 766 intelligence products that it disseminated to 6,079 law enforcement partners. <sup>a</sup> See sidebar for additional information about these intelligence product disseminations.
El Dorado Task Force	El Dorado Task Force New York reported that in fiscal year 2023, its operations resulted in 101 criminal arrests, 79 indictments, 52 convictions, 57 disruptions and 39 dismantlements of criminal organizations, seizures of \$53.3 million and 532 pounds of drugs, and 10 seizures of arms, ammunition, or explosives.

<sup>66</sup>We analyzed open-ended narrative responses provided by the interviewees. The responses are not generalizable to all individuals who participate in the collaborative groups but offer illustrative examples and perspectives on interagency collaboration.

<sup>67</sup>[GAO-23-105520](#).

Collaborative group	Key outcomes
Joint Criminal Opioid and Darknet Enforcement team	The Joint Criminal Opioid and Darknet Enforcement team issues press releases with statistics about its larger joint operations. For instance, in May 2023, it announced an operation with results that included 288 arrests as well as seizures of 117 firearms, 850 kilograms of drugs, and \$53.4 million in cash and virtual currencies. <sup>b</sup>
Drug Enforcement Administration (DEA) Special Operations Division	DEA's Intelligence Division reported that in fiscal year 2023 it shared 32,416 intelligence products with the field. The Special Operations Division serves as a conduit for intelligence products to the field. DEA officials explained that data on DEA-led investigation results (such as seizures, disruptions, or dismantlements) include results of investigations the Special Operations Division supports.

Source: GAO analysis of agency documentation and interviews with agency officials. | GAO-25-106568

<sup>a</sup>OCDETF, OCDETF Fiscal Year 2023 Report: Moving Forward (Limited Official Use – Law Enforcement Sensitive).

<sup>b</sup>DOJ Office of Public Affairs, Largest International Operation Against Darknet Trafficking of Fentanyl and Opioids Results in Record Arrests and Seizures, May 2, 2023. U.S. and international law enforcement agencies conducted this operation across the United States, Europe, and South America to identify darknet drug vendors and buyers and make the arrests and seizures.

**Bridge Organizational Cultures.** GAO has reported that when collaborating entities work to bridge organizational cultures, such as by finding common ground and identifying shared interests, they can help create buy-in and reinforce mutual goals and expectations.<sup>68</sup> Almost all 46

collaborative group interviewees responded that their collaborative groups were very effective at having staff from all agencies work together through their group. Thirteen interviewees from all five collaborative groups mentioned that colocation in the same building helped facilitate effective collaboration among participating personnel. For example, one interviewee from El Dorado Task Force New York noted that the task force partners held regular quarterly meetings, which in addition to regular informal communication, helped facilitate collaboration. Two interviewees from Special Operations Division also stated that formal and informal communication helped to bridge organizational cultures.

In addition, some interviewees within OCDETF Fusion Center noted that, by design, every participating agency must agree to make case data available to all other agencies in the Fusion Center, which can help to bridge any organizational gaps. As four Fusion Center interviewees noted, all participants knew that they needed to “check their agency at the door”—meaning that Fusion Center participants, for purposes of their roles at OCDETF Fusion Center, prioritized the Fusion Center’s mission. One interviewee explained this helped them jointly participate in meeting the mission.

**Leverage Resources and Information.** GAO has reported that when collaborating entities work to leverage resources and information, such as by using methods, tools, or technologies to share relevant data and information, they can successfully address crosscutting challenges or opportunities.<sup>69</sup> Most collaborative group interviewees stated that their collaborative groups were very effective at leveraging resources and information available. Interviewees from four collaborative groups (OCDETF Fusion Center, IOC-2, El Dorado Task Force, Special Operations Division) noted that shared databases were important tools for facilitation of interagency information sharing and deconfliction of investigations. For example, one IOC-2 interviewee stated that while they may not be able to obtain data directly from a partner agency, IOC-2 has a database of shared information that personnel can query to find the information they seek.

<sup>68</sup>[GAO-23-105520](#).

<sup>69</sup>[GAO-23-105520](#).

In addition, one OCDETF Fusion Center participant noted that the Fusion Center's Strategic Management team met biweekly to discuss process improvements. All interviewees stated that their collaborative group was either very or somewhat effective at providing tools, technologies, and other resources. Twenty-eight interviewees across all five groups also stated that additional or enhanced resources—such as personnel or technology—could further enhance their collaborative groups' capabilities.

#### **Memoranda of Understanding**

Interviewees cited the use of Memoranda of Understanding (MOUs) as a helpful practice for effective collaboration, consistent with our leading collaboration practice about developing written guidance and agreements. Specifically, 21 interviewees from all five collaborative groups explained that having MOUs is helpful to lay the groundwork for and facilitate collaboration. For instance, three Drug Enforcement Administration (DEA) Special Operations Division officials explained that their MOUs helped get the Special Operations Division's collaboration work started, and two added that agreements regarding agency data protections are critical for keeping participating agencies comfortable with the group's data sharing operations.

Source: GAO analysis of comments from selected agency staff. | GAO-25-106568

Most interviewees noted that information flowed very effectively through their collaborative group. For example, one interviewee from the Joint Criminal Opioid and Darknet Enforcement team noted that through regular communications, the team was able to provide requested information to their agency as it arrived. Two interviewees from IOC-2 noted that information flowed well both formally and informally through meetings and correspondence. In addition, in conversations subsequent to the group interviews, leadership from each of the groups identified additional information about how the collaborative groups facilitate the flow of information. For example, four of the groups (OCDETF Fusion Center, IOC-2, El Dorado Task Force, and the Joint Criminal Opioid and Darknet Enforcement team) prepare and disseminate intelligence products to assist in agents' investigations. OCDETF Fusion Center and IOC-2 report they determine the effectiveness of the intelligence products they send to investigators in the field by gathering and evaluating feedback through voluntary survey forms (see sidebar on earlier page for additional context). El Dorado Task Force and Joint Criminal Opioid and Darknet Enforcement team officials informed us that they determine the effectiveness of such products through informal feedback provided by agents using those products.

In addition, interviewees from all groups stated that to the extent information sharing with foreign partners was in place, it was effective. For instance, El Dorado Task Force, IOC-2, and Special Operations Division have foreign partners formally participating with them. For El Dorado Task Force and Special Operations Division, there are foreign partners collocated with them. Four interviewees from four collaborative groups (El Dorado Task Force, the Joint Criminal Opioid and Darknet Enforcement team, OCDETF Fusion Center, and Special Operations Division) mentioned some barriers exist to information sharing with foreign partners due to diplomatic, regulatory, or procedural limitations.

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## **There Are No Government-wide Estimates of Resource and Workforce Needs to Counter Illicit Finance, but Agency-Specific Estimates Are Developed**

As shown earlier, a number of different federal agencies have responsibilities for investigating criminal financial networks or illicit finance activity, such as money laundering. Consequently, there is no one agency responsible for overseeing or coordinating all activities needed to counter illicit finance activity, and no one entity charged with estimating the resources or workforce needed to adopt a whole-of-government approach to this effort.

However, federal entities within departments and agencies that counter illicit finance activities have their own processes to estimate the resources and workforce needed to meet various aspects of their missions. In the area of illicit finance, agency officials have identified various needs such as greater data analysis capabilities or expertise in investigating financial crimes. For example, OCDETF officials have indicated that more data scientists and increased technological capabilities would enhance their ability to identify and communicate emerging threats and trends with transnational criminal organizations. They also stated that it would be beneficial to have more Assistant U.S. Attorneys with expertise on financial investigations.<sup>70</sup> Officials from HSI stated that their ability to counter criminal financial networks could be enhanced if provided with additional investigators with a strong financial background who can analyze complex financial transactions and identify patterns of criminal activity, as well as criminal analysts, forensic accountants, and data scientists. Some examples of how selected agencies determine workforce needs are presented below.

- **FBI.** FBI officials informed us that each year, headquarters reviews each field office's performance in areas of addressing priority threats and provides that threat review to each field office. The field offices then develop their own local strategies and determine where they need to allocate their resources.
- **DEA.** Officials stated that DEA uses a resource allocation process to develop its annual Financial Plan, which allocates funding to program offices. Under this process, program offices are to submit detailed spending plans with documentation and justification for their funding requests, which the Office of Resource Management then analyzes and prioritizes to ensure that mandatory items and mission critical needs are covered. This office then reviews each plan to ensure that funding requests are based on a reasonable approach, and after incorporating feedback from program offices and agency leadership, submits the annual financial plan to the DEA Administrator for approval.
- **HSI.** According to officials, HSI has a workload staffing model that uses investigative hours (i.e., workload) to estimate any shortfalls or surpluses in staffing. The model encompasses all investigative hours including those involving illicit finance activities.
- **OCDETF.** Officials informed us that OCDETF has begun a new approach to estimating workforce needs, which it plans to continue in the coming years. In prior years, OCDETF primarily focused on allocating a total sum of funds to its partner agencies that these agencies were expected to distribute in accordance with OCDETF priorities. Recently, OCDETF has adopted a new approach that it believes will better allocate resources to agencies and field offices best suited to address priorities. Specifically, officials informed us that before each annual budget cycle, OCDETF staff meet with staff from partner agencies to determine what those agencies consider to be their highest priority transnational organized crime threat areas and emerging threats. These priority and emerging threats are to be aligned with the Attorney General's strategic objectives and each agency's own goals and objectives.

After compiling each agency's submitted set of priorities, the OCDETF Director determines one overarching set of priority threat areas (e.g., human trafficking, fentanyl trafficking) for countering transnational organized crime in the upcoming budget cycle, again in alignment with DOJ-wide priorities and approved at the DOJ level. OCDETF officials stated that the agency intends to revisit these priorities each year for each budget cycle and adjust them as necessary, with the intention of adding new "priority funded" cases to its existing backlog of legacy cases each year. This process has recently been developed, with initial efforts beginning in 2021. OCDETF officials stated that the process will continue to

<sup>70</sup>According to OCDETF, their budget has been flat for the last 5 years. Officials report that this has constrained their ability to acquire additional resources.

evolve incrementally over time, and that its workforce estimation for fiscal year 2026 was currently under review as of June 2024.

As discussed earlier, in December 2021, Executive Order 14060 created the U.S. Council on Transnational Organized Crime (USCTOC) to monitor the production and implementation of coordinated strategic plans for whole-of-government counter-transnational organized crime efforts, in alignment with policy priorities established by the President through the NSC.<sup>71</sup> As part of these efforts, an interagency USCTOC Strategic Division was created to produce such coordinated strategic plans. While the USCTOC could potentially oversee or facilitate government-wide estimates of resource or workforce needs to counter transnational organized crime, DHS and DOJ officials involved with the Strategic Division informed us that it has not been charged with doing so. According to NSC, it does not currently have such an effort. An NSC official explained that to help in understanding the available resources to combat transnational organized crime, the USCTOC Strategic Division has identified all domestic and international federal task forces dedicated to the most significant transnational organized crime threats.<sup>72</sup>

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## Conclusions

The United States uses a variety of tools to counter illicit finance activities. These tools include several national strategies and efforts—such as the *United States Strategy on Countering Corruption* and the *Presidential Initiative for Democratic Renewal*—and collaborative groups that conduct or support investigations of illicit finance and money laundering. We found that selected law enforcement and intelligence collaborative groups collaborate to counter illicit finance activities. Further, federal agencies are actively implementing national strategies and efforts to counter illicit finance activities.

However, progress toward achieving the objectives of certain government-wide strategies and efforts is unknown because some of the agencies that lead these activities have not established joint, overarching goals or have not regularly collected and assessed performance information tied to goals—or have not done either. For example, Treasury’s Office of Terrorist Financing and Financial Crimes does not have a process for collecting and assessing performance information that would quantify the extent to which goals in the *National Strategy for Combating Terrorist and Other Illicit Financing* were met. In addition, while some agencies collect their own performance information tied to the *United States Strategy on Countering Corruption*, there are no metrics to measure progress for the strategy overall. Furthermore, neither the U.S. Agency for International Development nor State, in collaboration with NSC, have defined unifying, joint performance goals or developed a method to collect and assess evidence that could help quantify the extent to which agencies are meeting the objectives of the *Presidential Initiative for Democratic Renewal*. Establishing joint, overarching goals and methods to collect related information and assess progress could help agencies better demonstrate the effectiveness of their efforts and manage potential fragmentation. These actions could also enhance

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<sup>71</sup>The USCTOC consists of the following members or their designees: the Attorney General; Director of National Intelligence; and Secretaries of Defense, Homeland Security, State, and Treasury.

<sup>72</sup>The requirement for the USCTOC Strategic Division to identify these task forces was established in the 2023 White House Strategy to Combat Transnational Organized Crime (December 2023). In May 2024, the USCTOC Strategic Division prepared documents listing such domestic federally-run or federally-funded task forces; the USCTOC Strategic Division noted that it may map foreign-based task forces in the future. The documents prepared included brief mission descriptions and participating agencies for each task force group, network, or center, as well as their locations, staffing numbers and staffing composition. The USCTOC Strategic Division also reported developing maps of task force locations.

interagency collaboration, improve accountability, and help ensure effective implementation of strategies and efforts to counter illicit finance activities.

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## Recommendations for Executive Action

We are making a total of four recommendations, including one to Treasury, one to the National Security Council, one to USAID, and one to State.

The Secretary of the Treasury should work with relevant agencies to implement a process for collecting and assessing evidence on the extent to which agencies are achieving the goals outlined in the *National Strategy for Combating Terrorist and Other Illicit Financing*. (Recommendation 1)

The National Security Council, in its annual reporting of progress made against the *United States Strategy on Countering Corruption's* goals, should include reporting on metrics developed to measure progress against each strategic objective. (Recommendation 2)

The USAID Administrator, in consultation with State and the National Security Council, should establish joint goals and a method to assess progress for implementing the *Presidential Initiative for Democratic Renewal*. (Recommendation 3)

The Secretary of State, in consultation with USAID and the National Security Council, should establish joint goals and a method to assess progress for implementing the *Presidential Initiative for Democratic Renewal*. (Recommendation 4)

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## Agency Comments and Our Evaluation

We provided a draft of this report to DHS, DOJ, IRS, NSC, Office of the Director of National Intelligence, ONDCP, State, Treasury, USAID, and USPS. State, USAID, and USPS provided written comments which are summarized below (for State and USAID) and reproduced in appendices VI, VII, and VIII, respectively. Treasury's Deputy Assistant General Counsel for Enforcement and Intelligence provided comments via email, which we summarized below. DHS, DOJ, IRS, Office of the Director of National Intelligence, Treasury, and USAID also provided technical comments, which we incorporated as appropriate. ONDCP informed us that they did not have formal or technical comments. NSC did not provide comments.

With respect to our first recommendation that Treasury work with relevant agencies to implement a process for collecting and assessing evidence on the extent to which agencies are achieving the goals outlined in the *National Strategy for Combating Terrorist and Other Illicit Financing* (Illicit Finance Strategy), Treasury informed us via email that it did not concur with the recommendation. In technical comments provided, Treasury conveyed the following:

- Treasury noted that it already collects and assesses information on various agency efforts related to priority actions and supporting actions in the Illicit Finance Strategy, and that it is inaccurate to say that Treasury does not collect or assess performance information related to actions or benchmarks. We note that in the 2024 Illicit Finance Strategy, Treasury lists efforts undertaken under each priority and supporting action identified in the 2022 Illicit Finance Strategy since the prior Illicit Finance Strategy

was developed. However, as discussed in our report, this information does not assess or provide a determination of the extent to which these efforts fulfill the intent of the supporting actions or priorities previously identified. Specifically, the 2022 Illicit Finance Strategy identified a number of benchmarks (which we refer to in our report as goals) for progress in 2024 under each supporting action. However, the 2024 Illicit Finance Strategy does not refer back to those benchmarks nor does it identify the extent to which they were met. Doing so could provide Treasury with clearer information on the extent to which it is satisfying its identified supporting actions, and thus, achieving priorities and goals identified in the Illicit Finance Strategy.

- Treasury stated that the 2024 Illicit Finance Strategy does assess the relative progress that the U.S. government has made in addressing set benchmarks in support of supporting actions, whether to a limited, moderate, or significant extent. However, our review of the Strategy shows that such progress is not captured in the document. For example, the 2024 Illicit Finance Strategy does not contain a clear indication of the extent to which previously identified benchmarks under each supporting action were met. Such indications would also help identify whether more actions need to be, or should have been, taken toward a given benchmark. Further, Treasury reported that benchmarks from the prior Illicit Finance Strategy that are considered to be fully addressed by the 2024 Illicit Finance Strategy are removed from the list of benchmarks in the latter strategy. We added language to the report based on Treasury's comments, as appropriate, to clarify how Treasury addresses benchmarks as the Strategy is updated. By removing or replacing these benchmarks in the updated strategy and not referencing them, Treasury misses opportunities to determine or demonstrate its overall progress in achieving what it set out to achieve in the 2024 Illicit Finance Strategy.

While Treasury has taken important steps in identifying actions taken in implementing the Illicit Finance Strategy, we continue to believe that implementing this recommendation could help Treasury better assess the extent to which it and its partner agencies are meeting the goals of the Strategy. We will monitor Treasury's actions and the extent to which they address this recommendation.

With respect to our third recommendation that USAID, in consultation with State and the National Security Council, should establish joint goals and a method to assess progress for implementing the *Presidential Initiative for Democratic Renewal* (Initiative), USAID concurred. USAID stated that it will continue to work through these mechanisms to improve and further establish methods to assess progress in implementing the Initiative.

With respect to our fourth recommendation that State, in consultation with USAID and the National Security Council, should establish joint goals and a method to assess progress for implementing the Initiative, State said it concurred with the intent of the recommendation but believes its existing efforts satisfy the recommendation. In responding to our draft report, State noted that the Initiative covered issues broader than illicit finance and corruption and believed that specific to those two issues, the recommendation has been satisfied through existing strategic planning and reporting. State also noted in its response that with respect to the anti-corruption and illicit finance elements of the Initiative, State and USAID have a shared approach to reporting under strategic objectives and performance goals focused on anti-corruption under both State and USAID's *Joint Strategic Plan* for fiscal years 2022 through 2026 and State's plan for implementing the *United States Strategy on Countering Corruption*. State also stated that programs under the Initiative have goals and performance metrics in line with broader strategic objectives.

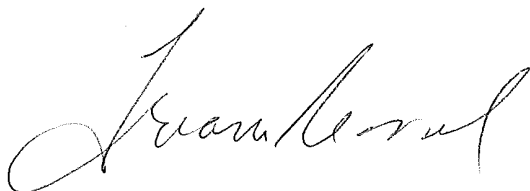
We agree that the Initiative, in defining its five areas of work, categorizes one area specifically as “fighting corruption”. However, State and its partner agencies remain responsible for addressing not only this area but the remaining four areas of work—supporting free and independent media, bolstering democratic reformers, advancing technology for democracy, and defending free and fair elections and political processes—as well. While these areas of work are not specifically categorized as countering corruption or illicit finance, addressing them has great implications for strengthening the ability of democratic nations to combat these ills by extension. For example, supporting free and independent media could bolster the efforts of democratic nations to uncover illicit financial activity and corruption within their nations. Establishing goals and assessing progress in implementing all areas of work under the Initiative could enhance the understanding of the extent to which these efforts are being achieved.

Regarding State’s broader strategic objectives under the *Joint Strategic Plan* and *Annual Performance Plan and Annual Performance Report* that it shares with USAID, as well as its implementation plan for the *United States Strategy on Countering Corruption*, we understand that efforts being undertaken through these strategic documents may also help meet the aims of the Initiative. As discussed in our report, we are also aware that State and its partner agencies provide updates to NSC on efforts to implement programs under the Initiative. However, these strategic documents do not contain information on the extent to which such efforts are advancing implementation of the Initiative. Specifically, the documents do not contain measurable results, such as how, when, or the degree to which efforts undertaken or programs implemented will achieve the results intended by the Initiative. We continue to believe that State, in consultation with USAID and the National Security Council, should work to establish joint goals and a method to assess progress in implementing the Initiative. We will monitor State’s actions and the extent to which they address this recommendation.

As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to the appropriate congressional committees, the Administrator of USAID, the Attorney General, the Commissioner of the IRS, the Director of National Intelligence, the Director of ONDCP, the National Security Council, the Postmaster General, and the Secretaries of Homeland Security, State, and the Treasury. In addition, the report will be available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-8777 or [McneilT@gao.gov](mailto:McneilT@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IX.

Sincerely,



Triana McNeil  
Director, Homeland Security and Justice

# Appendix I: Objectives, Scope, and Methodology

This report addresses (1) the roles and responsibilities of selected agencies in investigating and prosecuting entities involved in illicit finance activities; (2) progress made with selected strategies and efforts to counter illicit finance activities; (3) the extent to which selected law enforcement and intelligence agencies collaborate with federal and foreign entities to counter illicit finance activities; and (4) the availability of agency and government-wide estimates of resource and workforce needs to counter illicit finance.

Numerous law enforcement agencies investigate illicit finance activities. To inform our work, we selected the following six agencies for our review: Federal Bureau of Investigation (FBI), Drug Enforcement Administration (DEA), Immigration and Customs Enforcement's (ICE) Homeland Security Investigations (HSI), Internal Revenue Service's Criminal Investigation (IRS-CI), U.S. Postal Inspection Service (USPIS), and U.S. Secret Service (Secret Service). These agencies were selected because they were responsible for referring about 75 percent of all money laundering-related cases to federal prosecutors from fiscal year 2018 through fiscal year 2022, the most recent data available at the time of our selections.<sup>1</sup> This assessment was based on our review of data from the Executive Office for United States Attorneys (EOUSA) on the number of cases referred to federal prosecutors under federal money laundering-related statutes for fiscal years 2018 through 2022.<sup>2</sup>

In addition to these agencies, we identified five interagency collaborative groups that combat illicit finance and money laundering activities for inclusion in our discussion of roles and responsibilities, as well as for answering our third objective (discussed further below). These collaborative groups are the Organized Crime Drug Enforcement Task Forces (OCDETF) Fusion Center, International Organized Crime Intelligence and Operations Center (IOC-2), DEA Special Operations Division, El Dorado Task Force, and the Joint Criminal Opioid and Darknet Enforcement team. We selected these collaborative groups because they have a mission or purpose that aligns closely with the scope of our review, are operationally focused on investigations or information sharing, and involve most of the agencies in our scope.

To address our first objective, we reviewed documents including applicable laws and regulations, Congressional Budget Justifications, performance reports, and memoranda of understanding, and interviewed officials from each agency or group. To identify agencies responsible for prosecuting and assessing penalties against entities conducting illicit financial activity, we reviewed relevant documents, interviewed officials with the Department of Justice and leveraged information from a prior GAO report.<sup>3</sup>

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<sup>1</sup>Though the Executive Office for United States Attorneys (EOUSA) data capture the referring agencies for Immigration and Customs Enforcement, Internal Revenue Service (IRS), and United States Postal Service, we focused our review for these agencies on ICE-HSI because it is the principal investigate arm of DHS and ICE and investigates transnational and finance crimes; IRS-CI because it is the law enforcement arm of IRS and investigates federal tax crimes; and USPIS because it is the law enforcement arm of the United States Postal Service, responsible for combating mail fraud, money laundering, and drug trafficking through the mail. In addition, EOUSA data listed "all other Homeland Security" among the top 75 percent of referring agencies (with about 5 percent of cases referred), but their data system did not allow for a breakout of the agencies within this category, so we excluded it from our review.

<sup>2</sup>EOUSA provides executive and administrative support for the 93 United States Attorneys. For this report, we defined "federal money laundering-related statutes" as the following: 18 U.S.C. § 1956, 18 U.S.C. § 1957, 18 U.S.C. § 1960, 31 U.S.C. § 5313, 31 U.S.C. § 5316, 31 U.S.C. § 5324, 31 U.S.C. § 5331, and 31 U.S.C. § 5332.

<sup>3</sup>GAO, *Anti-Money Laundering: Better Information Needed on Effectiveness of Federal Efforts*, [GAO-24-106301](#) (Washington, D.C.: Feb. 8, 2024).

To address our second objective on progress made with selected strategies and efforts to counter illicit finance activities, we reviewed relevant strategies and efforts and related implementation plans, including those publicly and not publicly available (e.g., documents marked sensitive by agencies).<sup>4</sup> To determine the progress agencies are making to implement each strategy and effort, we obtained and reviewed available information such as agency documentation, White House fact sheets, and press releases. We also obtained agency documentation such as implementation plans and agency summary documents related to the status of their implementation efforts. Of these strategies and efforts, we selected four that we characterized as long-range, multiagency undertakings related to countering illicit finance activities. These were the *National Drug Control Strategy*; *National Strategy for Combating Terrorist and Other Illicit Financing*; the *United States Strategy on Countering Corruption*; and the *Presidential Initiative for Democratic Renewal*. For the four selected strategies and efforts, we determined whether they contained clearly identifiable goals and information related to assessing performance tied to such goals.<sup>5</sup>

We further interviewed officials at agencies contributing to or responsible for leading all of the strategies and efforts in our review to better understand the status of their implementation efforts.<sup>6</sup> For the four selected strategies and efforts, we also asked agency officials about the extent to which they set measurable goals and collect and assess relevant performance information that could help quantify whether they are reaching those goals. We then reviewed agency responses and documentation and compared them to selected key practices for evidence-based policymaking, including setting goals to identify results, collecting performance information to measure progress, and using that information to assess results and inform decisions. We also compared

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<sup>4</sup>The strategies and efforts include: the Financial Crimes Enforcement Network (FinCEN) *Anti-Money Laundering and Countering the Financing of Terrorism National Priorities*; *National Drug Control Strategy*; *National Strategy for Combating Terrorist and Other Illicit Financing*; the *United States Strategy on Countering Corruption*; the *Presidential Initiative for Democratic Renewal*; Task Force KleptoCapture; REPO Task Force; expansion of Treasury authorities to impose sanctions on foreign persons involved in the global illicit drug trade (Exec. Order No. 14059, 86 Fed. Reg. 71,549, Dec. 15, 2021); and establishment of the United States Council on Transnational Organized Crime (Exec. Order No. 14060, 86 Fed. Reg. 71,793, Dec. 15, 2021). Our use of the term “efforts” in this context refers to the Presidential initiative, task forces, and Executive Orders. In February 2024, we reported on FinCEN’s efforts in implementing various provisions of the Bank Secrecy Act and Anti-Money Laundering Act (AML). In that report, we recommended that FinCEN develop and implement a plan to inform Congress and the public about its progress in implementing AML and improve the reliability of annual customer satisfaction surveys and appropriately disclose survey data limitations. As such, we summarized those findings and additional information about FinCEN’s National Priorities in the background of this report. For further information, see GAO, *Anti-Money Laundering: Better Information Needed on Effectiveness of Federal Efforts*, [GAO-24-106301](#) (Washington, D.C.: Feb. 8, 2024).

<sup>5</sup>For the National Drug Control Strategy, we reviewed our prior work in which we found that the Strategy fully met its statutory requirements related to comprehensive, long-range, quantifiable goals, and targets to accomplish those goals. For more information, see GAO, *Drug Control: Office of National Drug Control Policy Met Some Strategy Requirements but Needs a Performance Evaluation Plan*, [GAO-23-105508](#) (Washington, D.C.: Dec. 19, 2022).

<sup>6</sup>We interviewed officials from lead agencies which include Department of Treasury’s Office of Terrorist Financing and Financial Crimes; Department of Treasury’s Office of Foreign Assets Control; Department of State; United States Agency for International Development; Department of Justice’s Office of the Deputy Attorney General; and U.S. Council on Transnational Organized Crime.

them with leading practices to enhance interagency collaboration, including defining common goals and outcomes and ensuring accountability for common outcomes by monitoring progress toward the outcomes.<sup>7</sup>

To address the third objective examining law enforcement and intelligence agencies' collaboration to counter illicit finance, we conducted 11 semi-structured group interviews with a nongeneralizable sample of staff from the following collaborative groups: OCDETF Fusion Center, IOC-2, El Dorado Task Force New York, the Joint Criminal Opioid and Darknet Enforcement team, and the Special Operations Division.<sup>8</sup> We selected these groups because they have responsibilities for coordinating activities across law enforcement entities to counter money laundering and illicit finance activities. Specifically, the interviewees included 46 supervisory and nonsupervisory staff from DEA, FBI, HSI, IRS-CI, OCDETF, Treasury, USFIS, and Secret Service, representing the following collaborative groups: OCDETF Fusion Center (17 interviewees from six agencies), IOC-2 (seven interviewees from five agencies), El Dorado Task Force (five interviewees from three agencies), the Joint Criminal Opioid and Darknet Enforcement team (seven interviewees from three agencies), and Special Operations Division (11 interviewees from six agencies).<sup>9</sup>

We reviewed leading interagency collaboration practices, selected key considerations for implementing each of the eight leading practices, and developed a set of interview questions based on those key considerations, modified to reflect the scope and mission of these collaborative groups (see table 7).<sup>10</sup>

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<sup>7</sup>Key practices for evidence-based policymaking can help agencies develop and use evidence to effectively manage and assess the results of federal efforts. In addition, leading practices to enhance interagency collaboration can help agencies collaborate more effectively to achieve important interagency outcomes, such as addressing illicit finance and corruption. We chose selected key practices for evidence-based policymaking and leading practices to enhance interagency collaboration that were the most relevant to our review. Specifically, we selected key and leading practices that we determined were particularly relevant to performance management activities—such as defining outcomes, sharing information, and assessing progress. For more information, see GAO, *Evidence-Based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts*, [GAO-23-105460](#) (Washington, D.C.: July 12, 2023). In addition, see GAO, *Government Performance Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges*, [GAO-23-105520](#) (Washington, D.C.: May 24, 2023).

<sup>8</sup>We also interviewed staff from the KleptoCapture and REPO Task Forces. Because these task forces are part of the efforts discussed in our second objective, we presented information gained from these interviews in that section of the report.

<sup>9</sup>Agency participation in each interview was dependent on agency involvement with each collaborative group. One interviewee was involved with two different collaborative groups and spoke on behalf of each. Supervisory staff from seven agencies were available to participate; nonsupervisory staff from four agencies were available to participate.

<sup>10</sup>[GAO-23-105520](#). This report identified eight leading interagency collaboration practices, each of which included key considerations (in the form of questions) for collaborating entities to use when implementing them. We asked questions about effectiveness and clarity of collaboration group activities relating to these eight leading practices. Response categories related to effectiveness and clarity included 5-point Likert scales. Response options for effectiveness were very effective, somewhat effective, neither effective nor ineffective, somewhat ineffective, or very ineffective. Response options for clarity—which applies only to the question posed under “Identify and Sustain Leadership”—included: very clearly, somewhat clearly, neither clearly or unclearly, somewhat unclearly, or very unclearly. Some interviewees explained that certain questions were not applicable to them in their specific roles, so we recorded their responses as “Not applicable.” Interviews were conducted in a semi-structured manner allowing for occasional question variation and specific probes for different collaborative groups. For example, we tailored question sets to include specific questions about memorandums of understanding (MOUs) relevant to specific collaborative groups and interviewees as needed.

Table 7: Discussion Group Interview Questions Grouped by Interagency Collaboration Leading Practices

Leading interagency collaboration practices	Questions asked on interagency collaboration practices
Define Common Outcomes	How effective would you say your mechanism is at working internally to define common outcomes or objectives? How are outcomes monitored and communicated through your mechanism to ensure accountability? <sup>a</sup>
Ensure Accountability	How effective do you believe your mechanism's leadership is at ensuring outcomes or objectives are being reached?
Bridge Organizational Cultures	How effectively do you feel that staff from all agencies work together through this mechanism? How effective would you say your mechanism is at coordination and deconfliction of investigations with partner agencies?
Identify and Sustain Leadership	How clearly does your mechanism define who is in charge overall and in specific investigations?
Clarify Roles and Responsibilities	How effective would you say your mechanism is at clearly defining your roles and responsibilities as members of your respective agencies who are serving on the mechanism?
Include Relevant Participants	How effective do you believe your mechanism is at including all relevant agencies?
Leverage Resources and Information	How effective do you believe your mechanism is at providing you with tools, technologies, or other resources needed to conduct your duties? How well would you say information flows through your mechanism, both within the mechanism itself and to and from your agency? How effective would you say information sharing is outside of your information sharing mechanism? How effective would you say information sharing is with foreign partners, both inside and outside of your information sharing mechanism? How effectively would you say your agency contributes to your mechanism's mission? How effectively would you say your mechanism uses criminal investigative data that you collect and provide?
Develop and Update Written Guidance and Agreements	What, if any, guidance is in place governing your interactions with partner agencies in this mechanism? <sup>a</sup>

Source: GAO analysis of comments from selected agency staff. | GAO-25-106568

<sup>a</sup>Because these were open-ended questions, responses were not provided on a 5-point Likert scale as were responses to the other questions, and thus not included in tables 5 and 23 (appendix V) of this report. We recorded the interviewees' responses and used them to provide illustrative examples where applicable.

Interviewees responded to each question on behalf of and as applicable to their agencies' participation in their respective collaborative groups. We directed interviewees to respond using a 5-point Likert scale for most questions. We also allowed interviewees to provide supporting narrative responses and asked for additional clarification to better understand interagency collaboration practices. We tabulated and summarized the responses, identifying themes and illustrative examples. Because the sample of participants was nongeneralizable, the testimonial evidence collected during these group interviews and our analysis are nongeneralizable. However, the views shared by collaborative group participants during these group interviews provided insights into how effectively these groups facilitated collaboration between members. We conducted additional interviews with all five collaborative groups to obtain information about their investigative outcomes and methods of tracking the effectiveness of their activities. Finally, we reviewed documentation provided or identified by agency officials on these topics, such as policies, reports, and press releases.

To address our fourth objective on agency and government-wide estimates of resource and workforce needs to counter illicit finance, we reviewed written information provided by selected agencies in our review in response

to our questions about estimating workforce and resource needs related to illicit finance activities. We also reviewed other written documentation provided by the agencies, as applicable, and interviewed selected agency officials regarding their workforce estimation processes.

We further sought to identify selected agencies' performance measures related to illicit finance and disruption and dismantlement of criminal organizations. To do so we identified relevant measures included in our February 2024 anti-money laundering report and reviewed recent agency information, including Congressional Budget Justification documents or performance reports, to identify fiscal year 2023 values for those measures.<sup>11</sup> To provide detailed information on illicit finance cases, outcomes, fines, forfeitures, and seizures, we also obtained updated summary-level data on illicit finance investigation outcomes covering fiscal years 2019 through 2023 from the following agencies and data sources:<sup>12</sup>

- EOUSA's CaseView, the case management system used by U.S. Attorneys' Offices to track data on their cases and defendants, including related charges, statutes, and sentencings.<sup>13</sup>
- The Department of Justice's (DOJ) Asset Forfeiture Management Staff's Consolidated Asset Tracking System (CATS), which tracks the lifecycle of assets seized for forfeiture by federal law enforcement agencies participating in DOJ's Assets Forfeiture Fund.<sup>14</sup> The data also reflect assets seized for forfeiture that are referred to the U.S. Attorneys' Offices for judicial forfeiture proceedings, regardless of the seizing agency.<sup>15</sup> CATS data do not include assets seized by agencies that participate in the Treasury Forfeiture Fund, which receives the proceeds of forfeitures from Treasury and Homeland Security law enforcement agencies.<sup>16</sup>
- OCDETF's Management Information System, the case management system used to track OCDETF investigations throughout their lifecycles. OCDETF investigations target high-priority drug trafficking, money laundering, and transnational criminal organizations.

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<sup>11</sup>[GAO-24-106301](#).

<sup>12</sup>These data were also reported in [GAO-24-106301](#) for fiscal years 2018 through 2022. One data set that we obtained unique to this report involved the sentence lengths of defendants found guilty of money laundering-related offenses.

<sup>13</sup>At the department level, DOJ uses a different case tracking system, called Docket, to track its cases.

<sup>14</sup>The Comprehensive Crime Control Act of 1984 established the Assets Forfeiture Fund as a special fund in Treasury to receive the proceeds of forfeitures pursuant to any law enforced or administered by DOJ. Pub. L. No. 98-473, § 310, 98 Stat. 1976, 2052-53 (codified, as amended, at 28 U.S.C. § 524(c)). The law authorizes the Attorney General to use the fund to, among other things, finance expenses associated with the execution of asset forfeiture functions and, with specific limitations, certain general investigative costs. DOJ participants in the fund are Asset Forfeiture Management Staff; the Bureau of Alcohol, Tobacco, Firearms, and Explosives; DEA; FBI; the Money Laundering and Asset Recovery Section; OCDETF; U.S. Attorneys' Offices; and U.S. Marshals Service. Other participants are the Department of Agriculture's Office of Inspector General, Department of Defense's Defense Criminal Investigative Service, Department of State's Diplomatic Security Service, U.S. Food and Drug Administration's Office of Criminal Investigations, and the U.S. Postal Inspection Service.

<sup>15</sup>Judicial forfeiture means a civil or a criminal proceeding in a United States District Court that may result in a final judgment and order of forfeiture.

<sup>16</sup>31 U.S.C. § 9705. Federal law enforcement agencies participating in the Treasury Forfeiture Fund include Treasury's IRS-CI and Homeland Security's U.S. Customs and Border Protection, HSI, U.S. Coast Guard, and U.S. Secret Service. Assets seized for forfeiture by these agencies would be included in CATS if they were referred to U.S. Attorneys' Offices for judicial forfeiture.

In obtaining data from CaseView and CATS, we asked the agencies to limit their search to selected federal money laundering-related statutes (see table 8).<sup>17</sup> OCDETF also tracks outcomes (e.g., convictions) associated with “financial violations.” OCDETF’s definition of “financial violations” includes some of the federal money laundering-related statutes we used to obtain data from the CaseView and CATS databases, and additional statutes, as described in table 8.

Table 8: Statutes Used to Identify Relevant Cases in Data We Obtained

	Statutes
Statutes included in requests for all three datasets	18 U.S.C. § 1956 – Laundering of monetary instruments
	18 U.S.C. § 1957 – Engaging in monetary transactions in property derived from specified unlawful activity
	18 U.S.C. § 1960 – Prohibition of unlicensed money transmitting businesses
	31 U.S.C. § 5324 – Structuring transactions to evade reporting requirement prohibited
	31 U.S.C. § 5332 – Bulk cash smuggling into or out of the United States
Additional statutes included for CaseView and Consolidated Asset Tracking System (CATS) only <sup>a</sup>	31 U.S.C. § 5313 – Reports on domestic coins and currency transactions
	31 U.S.C. § 5316 – Reports on exporting and importing monetary instruments
	31 U.S.C. § 5331 – Reports relating to coins and currency received in nonfinancial trade or business
Additional statutes for Organized Crime Drug Enforcement Task Forces (OCDETF) only <sup>b</sup>	18 U.S.C. § 1952 – Interstate and foreign travel or transportation in aid of racketeering enterprises
	18 U.S.C. § 371 – Conspiracy to commit offense or to defraud United States
	21 U.S.C. § 848(a), (b) – Continuing criminal enterprise
	26 U.S.C. § 7201 – Attempt to evade or defeat tax
	26 U.S.C. § 7203 – Willful failure to file return, supply information, or pay tax
	31 U.S.C. § 5322 – Criminal penalties for violations of 31 U.S.C. § 5311 et. seq.
	46 U.S.C. § 70503(a)(3) – Concealment of currency on a vessel
	Other financial violations listed in Titles 18, 26, or 31 of the United States Code

Source: GAO analysis and review of agency documentation. | GAO-25-106568

<sup>a</sup>Data from CaseView and CATS were both obtained using federal money laundering-related statutes, which we identified based on an analysis by the Department of the Treasury.

<sup>b</sup>These “additional statutes” from OCDETF, along with the statutes in the first row, comprise OCDETF’s definition of “financial violation” that it uses in its case tracking and performance measures.

We assessed the reliability of these data by reviewing related agency documentation (such as privacy impact statements and data dictionaries) and data reliability assessments from our prior report that used these data and found them to be reliable.<sup>18</sup> We also confirmed with agency officials that no changes had been made to the data systems or means of data gathering since our prior assessments were conducted. We determined the data were sufficiently reliable to describe federal outcomes of illicit finance investigations.

Furthermore, we identified information on the security threats posed by money laundering and illicit finance activities. To identify this information, we reviewed Treasury’s 2024 National Strategy for Combating Terrorist

<sup>17</sup>As noted in [GAO-24-106301](#), we selected the statutes based on a 2015 Treasury report, which identified the selected statutes as money laundering-related based on a joint analysis with EOUSA of around 5,000 federal indictments and other charging documents. See Department of the Treasury, National Money Laundering Risk Assessment 2015 (Washington, D.C.: 2015).

<sup>18</sup>These prior data reliability assessments were conducted as part of [GAO-24-106301](#).

and Other Illicit Financing, published in May 2024, which described the most significant money laundering and illicit finance threats and vulnerabilities to the United States. We discussed this information with agency officials. We describe these identified threats and vulnerabilities in appendix IV.

We conducted this performance audit from January 2023 to November 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

# Appendix II: Selected Agency Performance Measures and Outcomes of Illicit Finance Investigations

A number of federal agencies report performance measures on the outcomes of their investigations into illicit finance activities and efforts to disrupt or dismantle criminal organizations. These agencies include the Drug Enforcement Administration (DEA), Internal Revenue Service’s Criminal Investigation (IRS-CI), Organized Crime and Drug Enforcement Task Forces (OCDETF), and Immigration and Customs Enforcement’s (ICE) Homeland Security Investigations (HSI). In addition, the Department of Justice’s (DOJ) Executive Office for U.S. Attorneys (EOUSA), Asset Forfeiture Management Staff, and OCDETF maintain data on the outcomes of federal illicit finance investigations, including information on indictments, convictions, seizures, and forfeitures. These data are presented in this appendix.

## Federal Law Enforcement Agencies Collect and Report Data on the Outcomes of Their Illicit Finance Investigations

DEA, IRS-CI, and OCDETF collect and report an array of data, including convictions, seizures, and forfeitures. The agencies publicly report some of these outcomes in their annual performance plans and reports as performance measures (see table 9).

Table 9: Selected Examples of Illicit Finance-Related Performance Measures That Federal Agencies Use, Fiscal Year 2023

Agency	Performance measure	Target	Actual
Drug Enforcement Administration	Monetary value of currency, property, and drugs seized (total value intercepted) <sup>a</sup>	\$37 billion	\$21.8 billion
Internal Revenue Service’s Criminal Investigation	Number of defendants sentenced in money laundering cases	Not applicable	479
Organized Crime Drug Enforcement Task Forces	Percentage of investigations with indictments resulting in financial convictions	29%	28%
	Percentage of defendants with financial violations convicted	10%	10%

Source: Federal law enforcement agencies’ performance reports and related documentation. | GAO-25-106568

<sup>a</sup>In explaining the discrepancy between the target and actual values for this measure, DEA officials noted that the target of \$37 billion was implemented for fiscal year 2021, based on prior year averages, and was ambitious. This monetary value fluctuates because of unpredictable variations in both amount seized per engagement and the estimated market value of items seized. DEA added that the target value for fiscal year 2024 was changed to \$21 billion to better reflect post-COVID threats and current DEA resources.

DEA, HSI, and OCDETF also track and report data on high-priority organizations they disrupted or dismantled (see table 10).<sup>1</sup> The agencies define disruption as impeding the normal and effective operation of the targeted organization, as indicated by changes in organizational leadership, changes in methods of operation, or both.

<sup>1</sup>For OCDETF and DEA, high-priority targets are those on the Attorney General’s Consolidated Priority Organization Target list, the intent of which is to list the leaders of the most prolific transnational criminal organizations. HSI also tracks this metric specifically for high-threat transnational criminal organizations engaged in criminal activity related to illicit trade, travel, or finance.

They define dismantlement as destroying the organization’s leadership, financial base, and network to the degree that the organization is incapable of operating and reconstituting itself.

Table 10: Selected Examples of Performance Measures on Disruption and Dismantlement Used by Federal Agencies, Fiscal Year 2023

Agency	Performance measure	Target	Actual
Drug Enforcement Administration	Number of foreign priority target organizations that were disrupted or dismantled <sup>a</sup>	Not applicable	146
	Number of Sinaloa/Jalisco cartel-affiliated foreign priority target organizations that were disrupted or dismantled <sup>b</sup>	Not applicable	39
	Number of domestic priority target organizations that were disrupted or dismantled	Not applicable	1,048
	Number of Sinaloa/Jalisco cartel-affiliated domestic priority target organizations that were disrupted or dismantled <sup>b</sup>	Not applicable	101
Immigration and Customs Enforcement’s Homeland Security Investigations	Number of significant drug-related illicit trade, travel, and finance investigations that resulted in a disruption or dismantlement	81	251 <sup>c</sup>
	Number of significant non-drug-related illicit trade, travel, and finance investigations that resulted in a disruption or dismantlement	126	247 <sup>c</sup>
Organized Crime Drug Enforcement Task Forces	Number of transnational criminal organizations disrupted or dismantled	350	562 <sup>d</sup>
	Percent of disruptions or dismantlements of drug-trafficking organizations focused on the highest priority targets	31%	15%
	Number of organizations linked to consolidated priority organization targets that were disrupted or dismantled by investigations <sup>e</sup>	152	130

Source: Federal law enforcement agencies’ performance reports and related documentation. | GAO-25-106568

<sup>a</sup>A priority target organization engages in the highest levels of transnational criminal operations that significantly impact international, national, regional, or local communities.

<sup>b</sup>DEA cites its top operational priority as defeating the Sinaloa and Jalisco cartels—the two drug cartels based in Mexico that it states are responsible for most of the fentanyl and methamphetamine in the United States. According to DEA officials, it began reporting on these metrics related to the disruption and dismantlement of these cartels for fiscal year 2023 in its Fiscal Year 2025 Performance Budget Congressional Submission to reflect its operational and strategic priorities. DEA officials stated that developing targets for new measures is challenging in that it takes time to refine, baseline, and evaluate the measures. Thus, they did not establish targets for fiscal year 2023, but have established targets for fiscal years 2024 and 2025.

<sup>c</sup>ICE officials informed us that based on a DHS Office of Inspector General audit, it was determined that these values were inflated, as HSI counted disruptions and dismantlements with no transnational organized crime nexus. They added that this data reporting has since been corrected, and updated values will be reflected in fiscal year 2024 reporting.

<sup>d</sup>The reported actual number of transnational criminal organizations disrupted or dismantled is greater than the 510 reported in OCDETF’s Fiscal Year 2025 Congressional Justification. OCDETF explained to us that at times, not all data from the fiscal year are included when the budget is submitted due to reporting lag. Thus, when submitting the Congressional Justification, OCDETF used the number available at the time, which was 510 transnational criminal organizations disrupted or dismantled.

<sup>e</sup>The Attorney General’s consolidated priority organization target designation identifies the highest level of transnational criminal organization threat and serves as a key mechanism for focusing efforts to disrupt and dismantle the entire organization, including the named leader.

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## DOJ Datasets Provide a Multiagency View of Illicit Finance Investigation Outcomes

Summary data from three DOJ data sources capture information on illicit finance-related convictions and asset seizures and forfeitures across multiple federal law enforcement agencies for fiscal years 2019 through 2023.<sup>2</sup>

The data show that total convictions and fines declined from fiscal year 2019 through fiscal year 2021 and increased in fiscal years 2022 and 2023, while the number and value of asset seizures and forfeitures have generally fluctuated over most of the period. However, the data do not provide insights on the causes of the trends.

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### EOUSA Data on Charges and Convictions

Summary data from EOUSA<sup>3</sup> provide a variety of information on defendants charged and convicted (by disposition and referring agency), sentence lengths of convicted defendants, cases (by disposition and referring agency), and associated fines under federal money laundering-related statutes for fiscal years 2019 through 2023.<sup>4</sup>

#### Defendants Charged and Cases with Money Laundering-Related Charges

A range of 819 to 1,150 defendants per fiscal year were found guilty of money laundering-related charges during fiscal years 2019 through 2023, as shown in figure 2. Agencies refer their investigative matters to U.S. Attorneys' Offices for prosecution, and the Federal Bureau of Investigation (FBI), DEA, and Immigration and Customs Enforcement accounted for the greatest number of referrals that resulted in convictions during the period.<sup>5</sup> The data include any federal prosecutions in which the defendant was charged under one or more of the federal money laundering-related statutes. However, the data omit money laundering-related cases if a defendant was charged only under a predicate crime (such as narcotics trafficking) rather than a money laundering-related crime or if the money laundering charge did not result in a conviction.

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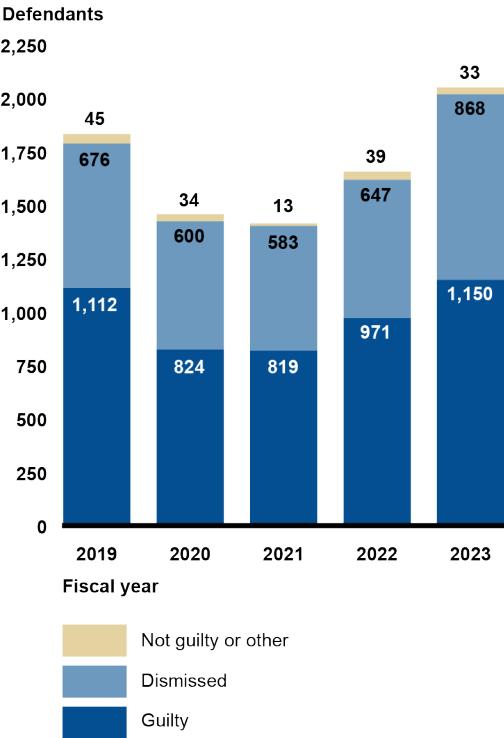
<sup>2</sup>The first of the three data sources we used was the EOUSA CaseView, the case management system used by U.S. Attorneys Offices to track data on their cases and defendants, including related charges, statutes, and sentencing. EOUSA is a component within DOJ that provides executive and administrative support for the 93 U.S. Attorneys. DOJ uses a different case tracking system, called Docket, to track its cases. To the extent a litigating component of DOJ is working a matter with a U.S. Attorney's Office, that information would be captured by CaseView. The second data source was DOJ's Asset Forfeiture Management Staff's Consolidated Asset Tracking System (CATS), which tracks the lifecycle of assets seized for forfeiture by participating federal law enforcement agents. The third data source was OCDETF's Management Information System, the case management system used to track OCDETF investigations throughout their lifecycles.

<sup>3</sup>According to EOUSA, while U.S. Attorneys' Offices prosecute the vast majority of cases, EOUSA's data may not include cases brought by DOJ's litigating components.

<sup>4</sup>In this report, we define "federal money laundering-related statutes" as the following: 18 U.S.C. § 1956, 18 U.S.C. § 1957, 18 U.S.C. § 1960, 31 U.S.C. § 5313, 31 U.S.C. § 5316, 31 U.S.C. § 5324, 31 U.S.C. § 5331, and 31 U.S.C. § 5332. See appendix I for further information.

<sup>5</sup>An HSI official told us that the agency's total number of indictments and convictions was greater than the totals reflected in the EOUSA data. The official said a reason for the discrepancy could be that EOUSA records one agency as the referring agency when multiple agencies participate in an investigative matter referred to a federal prosecutor.

Figure 2: Disposition Status of Defendants Charged under Federal Money Laundering-Related Statutes, Fiscal Years 2019–2023



Source: Executive Office for U.S. Attorneys' CaseView data. | GAO-25-106568

	2019	2020	2021	2022	2023
Not guilty or other	45	34	13	39	33
Dismissed	676	600	583	647	868
Guilty	1,112	824	819	971	1,150

Notes: A defendant was included in the data if charged with one or more of the federal money laundering-related statutes we identified. The disposition status of “other” includes (1) the case transferring districts, (2) the charge being included in another case, (3) adjudicated (juveniles and nonjuveniles), and (4) removal (Rule 40). Rule 40 of the Federal Rules of Criminal Procedure permits a judge, in certain circumstances, to require an individual who was charged with a federal offense in one district and apprehended in another to return to the court where the federal charges are pending. Additionally, the “dismissed” disposition status includes charges that have been dropped because of plea bargains. U.S. Attorneys’ Offices charged a range of 2,064 to 2,456 defendants annually under federal money laundering-related statutes in fiscal year 2019 through fiscal year 2023, according to EOUSA data, as shown in table 11.<sup>6</sup>

<sup>6</sup>According to EOUSA officials, defendants are often charged and sentenced in different years. Thus, the populations of defendants charged and the population of defendants whose cases have been resolved may be different.

**Appendix II: Selected Agency Performance Measures and Outcomes of Illicit Finance Investigations**

**Table 11: Defendants Charged under Money Laundering-Related Statutes, Number and Percentage by Referring Agency, Fiscal Years 2019–2023**

Agency	2019		2020		2021		2022		2023	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Drug Enforcement Administration	626	25%	507	24%	614	27%	498	23%	409	20%
Federal Bureau of Investigation	711	29%	669	32%	661	29%	622	28%	620	30%
Immigration and Customs Enforcement	213	9%	263	12%	211	9%	294	13%	149	7%
Internal Revenue Service-Criminal Investigation	134	5%	122	6%	144	6%	120	5%	123	6%
Joint task forces <sup>a</sup>	158	6%	104	5%	131	6%	118	5%	173	8%
Other <sup>b</sup>	614	25%	440	21%	539	23%	537	25%	590	29%
<b>Total</b>	<b>2,456</b>		<b>2,105</b>		<b>2,300</b>		<b>2,189</b>		<b>2,064</b>	

Source: Executive Office for U.S. Attorneys data. | GAO-25-106568

Notes: A defendant was included in the data if charged under one or more of the federal money laundering-related statutes we identified. Percentages may not sum to 100 due to rounding.

<sup>a</sup>Includes all charges stemming from a joint task force, including joint task forces denoted as a federal agency and a “state or local task force,” as well as state- or local-led task forces with federal agency participation.

<sup>b</sup>Includes all other agencies, none of which accounted for more than 5 percent of charges in fiscal year 2023.

In addition, EOUSA tracks data on cases, which can comprise multiple defendants. In fiscal years 2019 through 2023, U.S. Attorneys’ Offices annually filed between 890 and 1,047 cases with money laundering-related charges. Most cases were referred by DEA and FBI (see table 12).

**Table 12: Number and Percentage of Cases with Money Laundering-Related Charges by Referring Agency, Fiscal Years 2019–2023**

Agency	2019		2020		2021		2022		2023	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Federal Bureau of Investigation	296	28%	282	32%	337	33%	301	32%	346	35%
Drug Enforcement Administration	204	19%	166	19%	164	16%	170	18%	136	14%
Immigration and Customs Enforcement	121	12%	141	16%	120	12%	82	9%	98	10%
Internal Revenue Service-Criminal Investigation	94	9%	69	8%	93	9%	83	9%	81	8%
Joint task forces <sup>a</sup>	46	4%	36	4%	42	4%	34	4%	51	5%
Other <sup>b</sup>	286	27%	196	22%	269	26%	272	29%	278	28%
<b>Total</b>	<b>1,047</b>		<b>890</b>		<b>1,025</b>		<b>942</b>		<b>990</b>	

Source: Executive Office for U.S. Attorneys data. | GAO-25-106568

Notes: A case was included in the data if the charges included one or more charges of federal money laundering-related statutes we identified. Percentages may not sum to 100 due to rounding.

<sup>a</sup>Includes all charges stemming from a joint task force, including joint task forces denoted as a federal agency and a “state or local task force,” as well as state- or local-led task forces with federal agency participation.

<sup>b</sup>Includes all other agencies, none of which accounted for more than 4 percent of cases in fiscal year 2023.

Defendants Convicted, Sentence Lengths, and Cases with Money Laundering-Related Convictions

The EOUSA data show that the majority of defendants convicted of money laundering-related charges were referred to U.S. Attorneys’ Offices for prosecution by DEA, FBI, and Immigration and Customs Enforcement (see table 13).

Table 13: Number and Percentage of Defendants Convicted of Money Laundering-Related Charges by Referring Agency, Fiscal Years 2019–2023

Agency	2019		2020		2021		2022		2023	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Drug Enforcement Administration	323	29%	240	29%	248	30%	231	24%	323	28%
Federal Bureau of Investigation	277	25%	186	23%	207	25%	256	26%	296	26%
Immigration and Customs Enforcement	135	12%	110	13%	117	14%	123	13%	176	15%
Internal Revenue Service-Criminal Investigation	92	8%	54	7%	55	7%	68	7%	67	6%
Joint task forces <sup>a</sup>	84	8%	75	9%	51	6%	54	6%	59	5%
Other <sup>b</sup>	201	18%	159	19%	141	17%	239	25%	229	20%
Total	1,112		824		819		971		1,150	

Source: Executive Office for U.S. Attorneys data. | GAO-25-106568

Notes: A defendant was included in the data if charged under one or more of the federal money laundering-related statutes we identified. Percentages may not sum to 100 due to rounding.

<sup>a</sup>Includes all charges stemming from a joint task force, including joint task forces denoted as a federal agency and a “state or local task force,” as well as state- or local-led task forces with federal agency participation.

<sup>b</sup>Includes all other agencies, none of which accounted for more than 3 percent of guilty defendants in fiscal year 2023.

EOUSA data also show that defendants convicted of money laundering-related charges were sentenced to yearly averages of 83 to 91 months in prison from fiscal years 2019 through 2023 (see table 14).

Table 14: Statistics on Sentence Lengths, in Months, for Defendants Convicted of Money Laundering-Related Charges, Fiscal Years 2019–2023

Fiscal Year	Guilty Defendants	Minimum Sentence	Maximum Sentence	Median Sentence	Average Sentence
2019	1,112	1	1,044	54	83
2020	824	1	6,768	60	91
2021	819	1	2,544	54	85
2022	971	1	2,320	54	85
2023	1,150	1	900	58	89

Source: Executive Office for U.S. Attorneys data. | GAO-25-106568

Note: These data do not include defendants sentenced to time served (a sentence imposed by the court that is deemed to be completely satisfied by the defendant’s previous time spent in custody while awaiting sentencing), life imprisonment, or death. Data provided by the Executive Office for U.S. Attorneys show that for each year presented, anywhere from 80 to 104 defendants were sentenced to time served, and one to 11 were sentenced to life imprisonment.

The EOUSA data show that in each of fiscal years 2019 through 2023, between 380 to 540 cases resulted in a guilty outcome. FBI and DEA were the agencies that referred most of the cases resulting in guilty outcomes (see table 15).

Table 15: Number and Percentage of Cases with Money Laundering-Related Charges and Guilty Outcomes by Referring Agency, Fiscal Years 2019–2023

Agency	2019		2020		2021		2022		2023	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Federal Bureau of Investigation	130	24%	98	26%	117	27%	135	27%	140	27%
Drug Enforcement Administration	132	24%	69	18%	86	20%	84	17%	93	18%
Immigration and Customs Enforcement	75	14%	65	17%	87	20%	78	16%	93	18%
Internal Revenue Service-Criminal Investigation	53	10%	35	9%	34	8%	51	10%	41	8%
Joint task forces <sup>a</sup>	27	5%	23	6%	22	5%	19	4%	17	3%
Other <sup>b</sup>	123	23%	90	24%	82	19%	134	27%	132	26%
Total	540		380		428		501		516	

Source: Executive Office for U.S. Attorneys data. | GAO-25-106568

Note: A case was included in the data if it included one or more charges of federal money laundering-related statutes. Percentages may not sum to 100 due to rounding.

<sup>a</sup>Includes all charges stemming from a joint task force, including joint task forces denoted as a federal agency and a “state or local task force,” as well as state- or local-led task forces with federal agency participation.

<sup>b</sup>Includes all other agencies, none of which accounted for more than 5 percent of charges in fiscal year 2023.

Fines Associated with Money Laundering-Related Charges

EOUSA also tracks fines related to money laundering investigations. In fiscal year 2023, \$5.43 million in fines were imposed for investigations with a money laundering-related charge (see table 16).

Table 16: Number and Total Value of Fines Associated with Money Laundering-Related Charges, Fiscal Years 2019–2023

	2019	2020	2021	2022	2023
Number of fines	84	44	37	71	89
Total value (dollars in millions)	\$4.99	\$1.40	\$0.72	\$2.38	\$5.43

Source: Executive Office for U.S. Attorneys data. | GAO-25-106568

Notes: For defendants charged with both a money laundering-related statute and another criminal statute, the Executive Office for U.S. Attorneys could not determine if the criminal fine was ordered due to the money laundering statute, the other statute(s), or both.

In GAO, *Anti-Money Laundering: Better Information Needed on Effectiveness of Federal Efforts*, [GAO-24-106301](#) (Washington, D.C.: Feb. 8, 2024), dollar amounts for these data were reported in fiscal year 2022 dollars.

DOJ Data on Seizures and Forfeitures

Data from DOJ’s Asset Forfeiture Management Staff show that participating agencies seized assets valued from \$448 million to over \$1.8 billion per year in fiscal years 2019 through 2023.<sup>7</sup> FBI and the U.S. Postal Inspection Service were the agencies that seized the most assets in terms of dollar value in fiscal year 2023 (see table 17).

Table 17: Number and Dollar Value of Seized Assets Associated with Money Laundering-Related Statutes, Fiscal Years 2019–2023 (Dollars in Millions)

Seizing agency	2019		2020		2021		2022		2023	
	Number of assets	Value (\$)	Number of assets	Value (\$)	Number of assets	Value (\$)	Number of assets	Value (\$)	Number of assets	Value (\$)
Federal Bureau of Investigation	1,128	1,257.2	752	869.7	1,179	528.7	680	361.2	606	1,359.4
Drug Enforcement Administration	358	125.3	347	74.0	408	201.7	363	38.6	174	30.3
U.S. Postal Inspection Service	237	29.4	141	8.2	189	6.4	69	17.6	28	414.0
U.S. Marshals Service	47	5.9	31	2.2	40	0.3	42	0.1	38	0.1
Bureau of Alcohol, Tobacco, Firearms, and Explosives	43	0.3	78	1.4	93	1.6	79	1.0	8	0.8
Defense Criminal Investigative Service	18	12.4	44	12.6	7	2.1	14	20.3	9	3.6
Food and Drug Administration’s Office of Criminal Investigations	13	4.4	7	2.6	45	33.1	8	8.0	13	6.7
Diplomatic Security Service (Department of State)	6	0.2	1	0.2	16	1.0	10	2.1	1	0.2
Total	1,850	1,435.0	1,401	970.9	1,977	774.8	1,265	448.8	877	1,815.2

Source: Consolidated Asset Tracking System data. | GAO-25-106568

Notes: An asset was included in the data if it was associated with one or more of the federal money laundering-related statutes we identified. The Consolidated Asset Tracking System does not include data on assets seized by agencies that participate in the Department of the Treasury’s Forfeiture Fund (for example, the Internal Revenue Service and Immigration and Customs Enforcement). In [GAO-24-106301](#), published in February 2024, dollar amounts for these data were reported in fiscal year 2022 dollars.

<sup>7</sup>These data are housed in DOJ’s Consolidated Asset Tracking System (CATS) database, which tracks the life cycle of an asset seized for forfeiture. The data are used to support annual financial statements, audits, and congressional reporting, as well as to enable management to meet accountability requirements for seized and forfeited assets. CATS performs functions involved in the execution of the asset forfeiture program, including tracking, inventory, and status inquiry. CATS is not the official system of record for assets seized by agencies that participate in the Treasury Forfeiture Fund (for example, IRS, Immigration and Customs Enforcement). These assets are therefore not included in the seizure numbers.

**Appendix II: Selected Agency Performance Measures and Outcomes of Illicit Finance Investigations**

DOJ's Asset Forfeiture Management Staff data show \$344 million to over \$1.3 billion in forfeitures per year in fiscal years 2019 through 2023. FBI, DEA, the Internal Revenue Service, and Immigration and Customs Enforcement contributed the most forfeited assets (see table 18).<sup>8</sup>

**Table 18: Number and Dollar Value of Forfeited Assets Associated with Money Laundering-Related Statutes, Fiscal Years 2019–2023 (Dollars in Millions)**

Seizing agency	2019		2020		2021		2022		2023	
	Number of assets	Value (\$)	Number of assets	Value (\$)	Number of assets	Value (\$)	Number of assets	Value (\$)	Number of assets	Value (\$)
Federal Bureau of Investigation	524	494.2	567	968.4	590	214.1	674	318.4	521	99.6
Drug Enforcement Administration	401	101.4	283	27.1	309	58.5	223	24.8	338	45.6
Internal Revenue Service-Criminal Investigation	301	95.3	136	181.8	409	65.5	138	30.5	244	48.7
Immigration and Customs Enforcement	263	336.2	161	90.0	374	99.6	152	92.6	344	111.5
Bureau of Alcohol, Tobacco, Firearms, and Explosives	174	0.8	207	5.3	46	0.2	179	2.3	56	0.6
U.S. Postal Inspection Service	111	2.6	127	11.7	225	5.3	128	20.4	86	5.2
U.S. Customs and Border Protection	92	11.2	56	4.9	101	6.6	88	6.9	41	3.1
U.S. Secret Service	30	8.4	94	14.0	64	31.5	41	5.8	46	12.8
Diplomatic Security Service (Department of State)	23	0.4	3	0.1	2	0.1	10	0.3	1	0.2
Defense Criminal Investigative Service	9	1.0	12	1.7	19	8.7	17	7.4	17	3.4
Food and Drug Administration's Office of Criminal Investigations	6	1.8	6	0.7	8	4.1	19	8.8	20	9.0
U.S. Marshals Service	5	0.5	23	1.0	16	1.0	31	0.7	27	4.7
<b>Total</b>	<b>1,939</b>	<b>1,053.6</b>	<b>1,675</b>	<b>1,306.5</b>	<b>2,163</b>	<b>495.1</b>	<b>1,700</b>	<b>518.9</b>	<b>1,741</b>	<b>344.6</b>

Source: Consolidated Asset Tracking System data. | GAO-25-106568

Notes: An asset was included in the data if it was associated with one or more of the federal money laundering-related statutes we identified.

The Consolidated Asset Tracking System does not include data on administratively forfeited assets seized by agencies that participate in the Department of the Treasury's Forfeiture Fund (for example, the Internal Revenue Service and Immigration and Customs Enforcement). Forfeited assets seized by agencies that participate in the Department of the Treasury's Forfeiture Fund and referred to a U.S. Attorney's Office for judicial forfeiture proceedings are tracked in the Consolidated Asset Tracking System and therefore included in this table.

<sup>8</sup>According to DOJ, CATS is the official system of record for forfeited assets seized by agencies that participate in the Treasury Forfeiture Fund (for example: IRS, Immigration and Customs Enforcement) that were referred to a U.S. Attorney's Office for judicial forfeiture proceedings. These assets are therefore included in the forfeiture numbers. Treasury Fund assets that were forfeited through administrative proceedings are not included.

In [GAO-24-106301](#), published in February 2024, dollar amounts for these data were reported in fiscal year 2022 dollars.

## OCDETF Data on Convictions, Seizures, and Forfeitures

OCDETF maintains data on defendants in its investigations convicted of financial violations, disruptions and dismantlements of criminal organizations, and investigations resulting in asset seizures and forfeitures.<sup>9</sup> Although OCDETF data overlap with the DOJ data presented above, the data focus on high-level transnational, national, and regional criminal organizations and networks. For example, OCDETF tracks data on disruptions and dismantlements of such organizations.<sup>10</sup> All OCDETF investigations must have a financial component. For the purposes of its investigations, OCDETF defines “financial violation” more broadly to include federal money laundering-related statutes, as defined above, and related violations, such as tax evasion.<sup>11</sup>

As shown in table 19, 7 to 10 percent of the total convicted defendants in OCDETF investigations were convicted of financial violations in fiscal years 2019 through 2023.

**Table 19: Percentage and Number of Defendants in OCDETF Investigations Convicted of Financial Violations, Fiscal Years 2019–2023**

Investigation outcomes	2019	2020	2021	2022	2023
Percent of defendants convicted of financial violations	8%	8%	7%	10%	10%
Number of defendants convicted of financial violations	626	464	450	728	683
Number of defendants convicted	8,802	5,981	6,429	7,678	6,963

Source: Organized Crime and Drug Enforcement Task Forces (OCDETF). | [GAO-25-106568](#)

OCDETF also tracks outcomes based on the type of organization investigated. For example, OCDETF tracks disruptions and dismantlements tied to consolidated priority organization targets (targeting of the entire major transnational organized crime organization, including command and control elements and facilitators, such as money launderers) and regional priority organization targets (organizations whose drug or money laundering activities affect a region) (see table 20).<sup>12</sup>

<sup>9</sup>OCDETF tracks data on its investigations in its Management Information System. OCDETF investigative and prosecutorial personnel use the system to track and coordinate investigative efforts and collect data from the initiation of an OCDETF investigation through the closing of the case.

<sup>10</sup>OCDETF defines a disruption as impeding the normal and effective operation of the targeted organization, as indicated by changes in organizational leadership, methods of operation, or both. It defines a dismantlement as destroying the organization’s leadership, financial base, and network to the degree that the organization is incapable of operating and reconstituting itself.

<sup>11</sup>Additional statutes include, for example, 18 U.S.C. § 371 (tax conspiracy); 26 U.S.C. § 7201 (tax evasion); and 46 U.S.C. § 70503 (concealment of currency on a vessel).

<sup>12</sup>The consolidated priority organization target list (which is vetted by multiple agencies) contains the international drug trafficking and money laundering organizations determined to most affect the United States. The list is updated twice yearly. According to OCDETF, in addition to drug trafficking, nearly all of these targets are involved in multiple forms of organized criminal activity, such as violence, corruption, human smuggling, weapons trafficking, complex financial crimes, and cybercrime. The regional priority organization target list includes leaders of significant drug trafficking and money laundering organizations primarily responsible for a region’s drug threat.

Table 20: Number of Closed OCDETF Investigations Resulting in Disruption or Dismantlement of an Organization, Fiscal Years 2019–2023

Outcome	2019	2020	2021	2022	2023
Closed consolidated priority organization target investigations <sup>a</sup>	109	85	86	112	171
Resulting in a disruption	80	50	50	77	72
Resulting in a dismantlement	64	50	45	77	70
Closed regional priority organization target investigations <sup>b</sup>	141	94	94	113	146
Resulting in a disruption	53	36	42	56	51
Resulting in a dismantlement	69	31	43	54	55
Closed transnational organized crime investigations	501	374	366	540	667
Resulting in a disruption or dismantlement <sup>c</sup>	421	306	300	443	562

Source: Organized Crime and Drug Enforcement Task Forces (OCDETF). | GAO-25-106568

<sup>a</sup>The Attorney General’s consolidated priority organization target designation identifies the highest level of transnational criminal organization threat and serves as a key mechanism for focusing efforts to disrupt and dismantle the entire organization, including the named leader.

<sup>b</sup>A regional priority organization target is an organization whose drug trafficking or money laundering activities significantly affect a region.

<sup>c</sup>According to OCDETF, it tracks transnational organized crime disruptions and dismantlements in the aggregate; thus, this number cannot be disaggregated into separate categories.

Finally, a high percentage of OCDETF investigations resulted in assets being seized and forfeited. For example, in fiscal years 2019 through 2023, from 65 to 85 percent of closed investigations each year resulted in seizures (see table 21). Among closed investigations with indictments, 53 to 61 percent per year resulted in forfeited assets.

Table 21: Number of Closed OCDETF Investigations and Percentage Resulting in Assets Seized and Forfeited, Fiscal Years 2019–2023

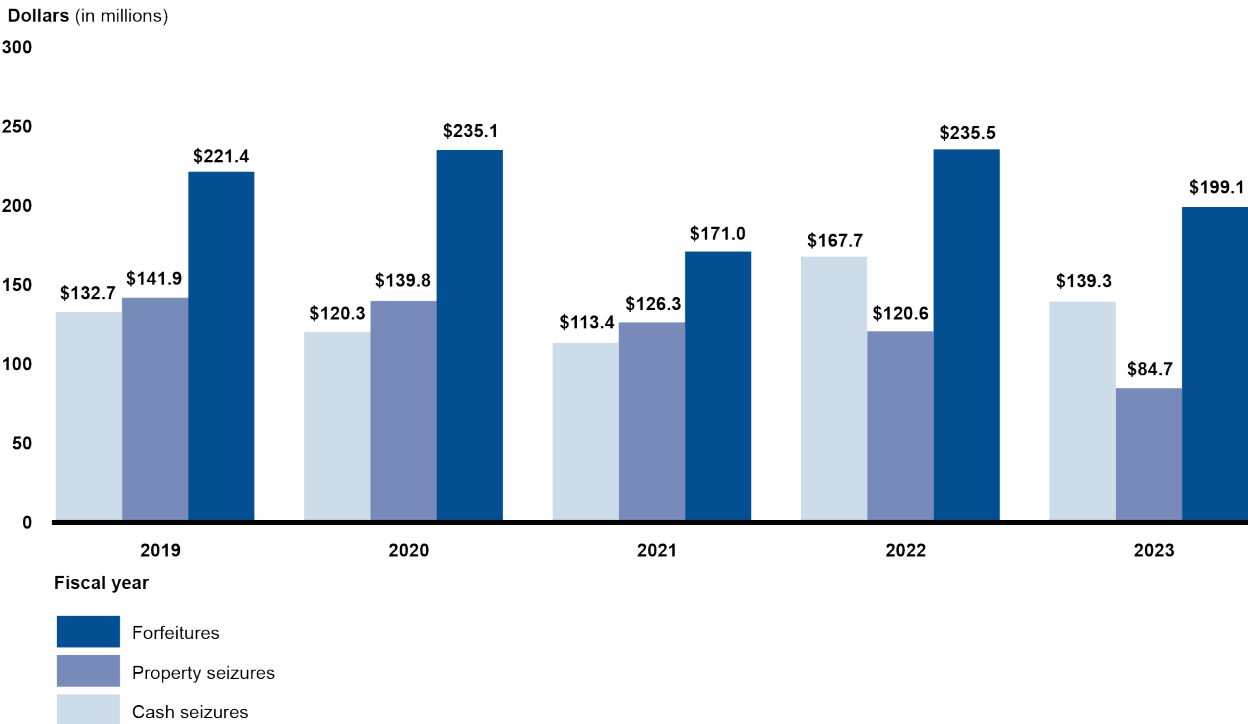
	2019	2020	2021	2022	2023
Closed investigations	724	616	570	727	1,126
Percent resulting in assets seized	85%	74%	75%	76%	65%
Closed investigations with indictments	747	552	520	688	967
Percent resulting in assets forfeited	53%	60%	59%	61%	53%

Source: Organized Crime and Drug Enforcement Task Forces (OCDETF). | GAO-25-106568

Figure 3 shows that in fiscal years 2019 through 2023, closed OCDETF investigations annually resulted in \$113 million to over \$167 million in cash seizures and \$170 million to over \$235 million in forfeitures. In addition to the data in the figure, during this period closed OCDETF investigations resulted in money judgments that ranged from around \$125 million to over \$750 million.<sup>13</sup>

<sup>13</sup>According to DOJ, as part of sentencing in a criminal forfeiture case, a court may order the defendant to pay a sum of money as a money judgment. In [GAO-24-106301](#), published in February 2024, dollar amounts for these data were reported in fiscal year 2022 dollars.

Figure 3: Value of Seizures and Forfeitures in Closed OCDETF Investigations, Fiscal Years 2019–2023 (Dollars in Millions)



Source: Organized Crime and Drug Enforcement Task Forces (OCDETF) data. | GAO-25-106568

Dollars (in millions)

	2019	2020	2021	2022	2023
Forfeitures	221.4	235.1	171	235.5	199.1
Property seizures	141.9	139.8	126.3	120.6	84.7
Cash seizures	132.7	120.3	113.4	167.7	139.3

Note: In [GAO-24-106301](#), published in February 2024, dollar amounts for these data were reported in fiscal year 2022 dollars.

# Appendix III: Collaborative Groups That Counter Illicit Finance Activities

Multiagency investigations are conducted or supported through collaborative groups such as the Organized Crime Drug Enforcement Task Forces Fusion Center and the International Organized Crime Intelligence and Operations Center. These groups serve to share information among participating agencies and coordinate and deconflict investigations, among other things. See table 22 for descriptions and membership of these groups included in the scope of our review.

Table 22: Selected Collaborative Groups That Conduct or Support Illicit Finance and Money Laundering Investigations

Collaborative group	Mission	Participating agencies
Organized Crime Drug Enforcement Task Forces (OCDETF)	OCDETF, an independent component within the Department of Justice (DOJ), uses a prosecutor-led, multiagency approach to lead coordinated investigations of transnational organized crime, money laundering, and major drug trafficking networks. OCDETF investigations must include a financial investigation. OCDETF is divided into nine regions, with 19 colocated Strike Forces—permanent teams of federal, state, and local law enforcement officers—that conduct operations throughout the nation.	Lead agency: Department of Justice (DOJ) Participating agencies: Bureau of Alcohol, Tobacco, Firearms and Explosives, DOJ Criminal Division, Department of Labor Office of the Inspector General, Department of State Diplomatic Security Service, Drug Enforcement Administration (DEA), Executive Office for U.S. Attorneys, Federal Bureau of Investigation (FBI), Immigration and Customs Enforcement's (ICE) Homeland Security Investigations (HSI), Internal Revenue Service's Criminal Investigations (IRS-CI), U.S. Coast Guard Investigative Service, U.S. Marshals Service, U.S. Postal Inspection Service (USPIS), and U.S. Secret Service.
Organized Crime Drug Enforcement (OCDETF) Fusion Center	Established in 2004, OCDETF Fusion Center is a data center that manages drug and related financial intelligence information from OCDETF's partner investigative agencies, Treasury's Financial Crimes Enforcement Network (FinCEN), and relevant data from many other partners. OCDETF Fusion Center is designed to conduct cross-agency data integration and analysis; to create intelligence pictures of targeted organizations, and to pass actionable leads to participants in the field, including colocated strike forces.	Lead Agency: OCDETF Participating Agencies: Bureau of Alcohol, Tobacco, Firearms and Explosives, U.S. Customs and Border Protection, Department of Commerce, DEA, Department of Health and Human Services Office of Inspector General, Diplomatic Security Service, Environmental Protection Agency, Federal Bureau of Investigation (FBI), FinCEN, Appalachia High Intensity Drug Trafficking Area, HSI, IRS-CI, Department of Labor – Office of Inspector General, Pandemic Response Accountability Committee, Transportation Security Administration, U.S. Coast Guard, United States Fish and Wildlife Service, U.S. Marshals Service, USPIS, U.S. Postal Service Office of Inspector General, Secret Service, Australian Federal Police, New Zealand Police, and the National Crime Agency (United Kingdom).

## Appendix III: Collaborative Groups That Counter Illicit Finance Activities

Collaborative group	Mission	Participating agencies
El Dorado Task Force	Established in 1992 at HSI's New York office, it is an anti-money laundering task force that consists of more than 200 members from over 30 law enforcement agencies in New York and New Jersey as part of its New York operations—including federal agents; international, state, and local police investigators; intelligence analysts; and federal prosecutors. ICE officials informed us that over the course of our review the El Dorado Task Force model has since expanded to all 30 HSI field offices with a Special Agent in Charge throughout the U.S.	Lead Agency: HSI Participating Agencies: DEA, FBI, Federal Housing Finance Agency Office of Inspector General, IRS, National Guard, U.S. Department of Health and Human Services Office of Inspector General, U.S. Probation Office, USPIS, U.S. Secret Service, and numerous state, local, and foreign entities.
International Organized Crime Intelligence and Operations Center (IOC-2)	Established in 2009, IOC-2 creates and disseminates intelligence products to support criminal investigations and prosecutions across the country and is regularly involved in deconfliction and case coordination. <sup>a</sup> It leverages tools managed by OCDETF Fusion Center and the multiagency Special Operations Division.	Lead Agency: OCDETF Participating Agencies: Bureau of Alcohol, Tobacco, Firearms and Explosives, Department of Commerce, DEA, Diplomatic Security Service, FBI, U.S. Fish and Wildlife Service, HSI, IRS-CI, Department of Labor-Office of Inspector General, DOJ Money Laundering and Asset Recovery Section, Pandemic Response Accountability Committee, Secret Service, Treasury Office of Foreign Assets Control, USPIS, and the National Crime Agency (United Kingdom).
Joint Criminal Opioid and Darknet Enforcement team	Established in 2018, it is an FBI-led Department of Justice initiative which supports, coordinates, and assists in de-confliction of investigations targeting the sale of illegal drugs online, especially fentanyl and other opioids. the Joint Criminal Opioid and Darknet Enforcement team also has an embedded team of analysts who write and disseminate targeting packages intended to initiate new drug trafficking investigations.	Lead Agency: FBI Participating Agencies: Bureau of Alcohol, Tobacco, Firearms and Explosives, U.S. Customs and Border Protection, DEA, DOJ Criminal Division, FinCEN, Food and Drug Administration, HSI, IRS, Naval Criminal Investigative Service, Treasury's Office of Foreign Assets Control (OFAC), and USPIS.
Drug Enforcement Administration (DEA) Special Operations Division	Established in 1994, it is a DEA-led, multiagency operational coordination center aimed at dismantling drug trafficking and terrorist organizations by attacking their command, control, and communications.	Lead Agency: DEA Participating Agencies: Bureau of Alcohol, Tobacco, Firearms and Explosives, Department of Defense, Department of Transportation, FBI, FinCEN, HSI, Treasury OFAC, U.S. Marshals Service, U.S. Customs and Border Protection, U.S. Coast Guard, USPIS, intelligence community partners, New York City Police Department, and agencies from Australia, Canada, New Zealand, and the United Kingdom.

Source: GAO analysis of information provided by each of the lead agencies listed above | GAO-25-106568

<sup>a</sup>IOC-2 and OCDETF Fusion Center officials have noted that when each entity was stood up, the Fusion Center focused more on supporting drug trafficking investigations, with IOC-2 focused more on transnational organized crime. However, over time OCDETF Fusion Center's mission has expanded to include more transnational organized crime-related investigations. The officials stated that the two groups are working together to better delineate their separate responsibilities.

# Appendix IV: Money Laundering and Illicit Finance Threats and Vulnerabilities Identified in Department of Treasury Risk Assessments and Strategies

As outlined in the 2024 National Risk Assessments, the United States faces a variety of illicit finance threat actors.<sup>1</sup> These include drug trafficking organizations, professional money launderers, corrupt officials, cybercriminals, human trafficking and human smuggling networks, and those seeking to finance terrorism and the proliferation of weapons of mass destruction. Vulnerabilities in the U.S. anti-money laundering/countering the financing of terrorism (AML/CFT) regime can allow criminals and other illicit actors to bypass systems designed to detect and prevent illicit financial activity, such as money laundering and the financing of terrorism and weapons of mass destruction proliferation. Some examples of these vulnerabilities include:

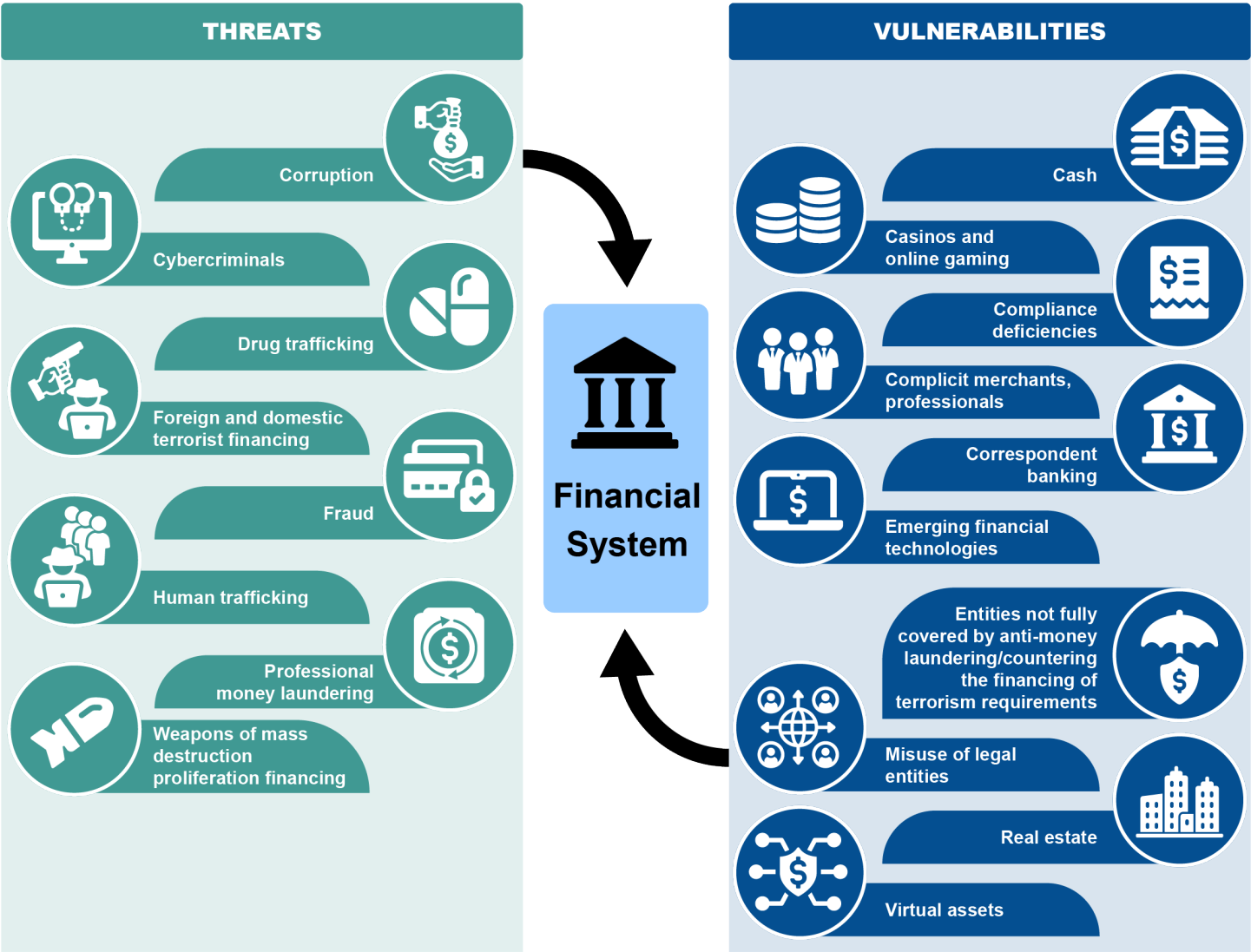
- abuse of the company formation process to create shell and front companies;
- financial intermediaries that are not obligated to maintain AML/CFT programs or report suspicious activity;
- foreign jurisdictions with weak AML/CFT regimes that are connected to the U.S. financial system;
- AML/CFT compliance vulnerabilities or deficiencies at U.S. financial institutions; and
- challenges in detecting, seizing, and forfeiting illicit proceeds of crime and identifying complicit professionals facilitating illicit finance.

Figure 4 depicts the current landscape of known threats and vulnerabilities to the financial system.

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<sup>1</sup>Press Release: Treasury Publishes 2024 National Risk Assessments for Money Laundering, Terrorist Financing, and Proliferation Financing, Treasury (Feb. 7, 2024), <https://home.treasury.gov/news/press-releases/jy2080>. According to Treasury risk assessments, Treasury generally defines “threats” as people, groups of people, or activities with the potential to cause harm by raising, moving, storing, or using funds and other assets for illicit purposes, such as those related to money laundering or terrorism. “Vulnerabilities” are what facilitate or create the opportunity for illicit activity—such as for money laundering, terrorism, or proliferation—and can include specific financial sectors or products, or openings in law, regulation, supervision, or enforcement.

Figure 4: Current Landscape of Known Threats and Vulnerabilities to the Financial System



Source: U.S. Department of Treasury; Icons-Studio/stock.adobe.com. | GAO-25-106568

As discussed earlier, the Department of Treasury’s (Treasury) biannual National Strategy for Combating Terrorist and Other Illicit Financing (Illicit Finance Strategy)—most recently published in May 2024—identifies significant money laundering and illicit finance threats and vulnerabilities to the United States.<sup>2</sup> Specifically,

<sup>2</sup>The 2024 Strategy was prepared pursuant to Sections 261 and 262 of the Countering America’s Adversaries Through Sanctions Act, Pub. L. No. 115-44, §§ 261, 262, 131 Stat. 886, 934-36 (2017). It updates the progress made on the priorities and supporting actions identified in the 2022 National Strategy for Combating Terrorist and Other Illicit Financing (2022 Strategy). The 2022 Strategy was prepared by the Department of the Treasury (Treasury) in consultation with the Departments of Justice, State, and Homeland Security, the Office of Management and Budget, and the staffs of the federal functional regulators. The staff of the federal functional regulators includes staffs of the Commodity Futures Trading Commission; the Federal Deposit Insurance Corporation; the Board of Governors of the Federal Reserve System; the National Credit Union Administration; the Office of the Comptroller of the Currency; and the Securities and Exchange Commission.

Treasury identified the current key illicit finance threats to be money laundering, terrorist financing, and proliferation financing.<sup>3</sup>

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## Money Laundering Threats and Vulnerabilities

According to the Illicit Finance Strategy, money laundering threats stem from various criminal activities such as fraud, drug trafficking, cybercrime, human trafficking, and corruption. The Strategy further states that criminals are more frequently using professional money launderers to help disguise and hide their illicit funds—for instance, by funneling funds through legitimate or illegitimate companies. Criminals use a variety of techniques to exploit vulnerabilities in the U.S. AML/CFT regime. Some vulnerabilities related to AML/CFT include (1) inadequate global AML/CFT regulation, supervision, and enforcement of virtual asset activities; (2) AML/CFT compliance deficiencies at banks and by other financial services professionals; and (3) entities not fully covered by AML/CFT requirements, such as investment advisers, third-party payment processors, attorneys, and accountants.

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## Terrorist Financing Threats and Vulnerabilities

The Illicit Finance Strategy states terrorist financing threats primarily involve self-funded, U.S.-based individuals and pose significant challenges to U.S. law enforcement and authorities.<sup>4</sup> Foreign terrorist threats, such as groups like ISIS and Iranian proxy groups, exploit U.S.-based supporters of their ideologies and seek to send money abroad or finance the travel of individuals, largely using financial channels such as registered and unregistered money services businesses, cash, and virtual assets.<sup>5</sup> Some vulnerabilities related to these threats include (1) misuse of financial products and services, such as money orders, pre-paid cards, and innovations in peer-to-peer payments; (2) complicit professionals who help facilitate illicit financial activity; and (3) legal and technological developments that have led to substantial growth in new financial products and services. Furthermore, foreign terrorist threats can exploit gaps in sanctions implementation and can use a variety of methods to raise funds from supporters worldwide.

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<sup>3</sup>The three risk assessments include the following: (1) U.S. Department of Treasury, *2024 National Money Laundering Risk Assessment*, (Washington, D.C.: Feb. 7, 2024); (2) U.S. Department of Treasury, *2024 National Terrorist Financing Risk Assessment*, (Washington, D.C.: Feb 7, 2024); and (3) U.S. Department of Treasury, *2024 National Proliferation Financing Risk Assessment*, (Washington, D.C.: Feb 7, 2024). According to the risk assessments, Treasury developed these findings based on a review of federal and state public sector analysis, enforcement actions, guidance, and interviews with Treasury staff, intelligence analysts, law enforcement agents, and prosecutors. The risk assessments are also informed by feedback and input from various private sector participants through formal and informal mechanisms and targeted meetings on illicit finance trends. Relevant components of agencies, bureaus, and offices of Treasury, Department of Justice, Department of Homeland Security, Department of State, and regulatory agencies, among others, participated in the development of the risk assessments. Data cited in the risk assessments is current as of January 31, 2024.

<sup>4</sup>The Illicit Financing Strategy states the primary terrorism threat to the homeland comes from U.S.-based individuals who are inspired by Al-Qaeda, ISIS, or domestic violent extremist ideologies who seek to carry out deadly attacks without direction from a foreign group.

<sup>5</sup>According to the Financial Crimes Enforcement Network, the term "money services business" includes any person doing business, whether or not on a regular basis or as an organized business concern, in one or more of the following capacities: (1) currency dealer or exchanger; (2) check casher; (3) issuer of traveler's checks, money orders or stored value; (4) seller or redeemer of traveler's checks, money orders or stored value; (5) money transmitter; or (6) U.S. Postal Service.

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## Proliferation Financing Threats and Vulnerabilities

According to the Illicit Finance Strategy, proliferation financing threats primarily involve state actors—such as Russia and the Democratic People’s Republic of Korea—who engage in illicit procurement and revenue generating activities. For example, Russia’s invasion of Ukraine illustrates its illicit procurement of goods and technologies with military applications, and the Democratic People’s Republic of Korea continues to conduct malicious cyber activity, such as ransomware attacks to illicitly raise revenue. Additionally, there are persistent efforts by other state actors, including Iran, the People’s Republic of China, Syria, and Pakistan, to exploit the U.S. financial system for weapons of mass destruction development and proliferation. Some vulnerabilities related to these threats include (1) procurement of luxury and high value goods, such as real estate, art, precious metals, and automobiles and (2) challenges in identifying and seizing proceeds from criminal activities.<sup>6</sup> Such activities provide state actors the resources to advance weapons activities in violation of international and U.S. sanctions or export controls.

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<sup>6</sup>Additional vulnerabilities cited in the Illicit Finance Strategy, include (1) misuse of cash, including bulk cash smuggling and cash-intensive businesses, and consolidation methods such as funnel accounts and cash consolidation cities; (2) ease of formation of and limited information required to create legal entities; and (3) misuse of casinos and online gaming.

# Appendix V: Results of Interviews with Selected Collaborative Group Members

In interviews we conducted with members of law enforcement and intelligence collaborative groups (Organized Crime Drug Enforcement Task Forces (OCDETF) Fusion Center, International Organized Crime Intelligence and Operations Center (IOC-2), El Dorado Task Force, Joint Criminal Opioid and Darknet Enforcement, and the Drug Enforcement Administration Special Operations Division, interviewees self-reported that overall their groups effectively coordinate interagency efforts to counter illicit finance. The group interviews included 46 selected supervisory and nonsupervisory staff members of law enforcement and intelligence collaborative groups.<sup>1</sup> Table 23 provides a summary of responses to Likert scale questions posed during these interviews based on interagency collaboration leading practices.

**Table 23: Law Enforcement and Intelligence Collaborative Group Participants’ Responses to GAO Questions on Leading Interagency Collaboration Practices**

Leading interagency collaboration practices	Questions on leading interagency collaboration practices <sup>a</sup>	Very effectively <sup>b</sup>	Somewhat effectively	Not applicable
Define Common Outcomes	How effective would you say your mechanism is at working internally to define common outcomes or objectives?	40	7	0
Ensure Accountability	How effective do you believe your mechanism’s leadership is at ensuring outcomes or objectives are being reached?	44	3	0
Bridge Organizational Cultures	How effectively do you feel that staff from all agencies work together through this mechanism?	46	1	0
	How effective would you say your mechanism is at coordination and deconfliction of investigations with partner agencies?	42	5	0
Identify and Sustain Leadership	How clearly does your mechanism define who is in charge overall and in specific investigations?	41	6	0
Clarify Roles and Responsibilities	How effective would you say your mechanism is at clearly defining your roles and responsibilities as members of your respective agencies who are serving on the mechanism?	39	8	0
Include Relevant Participants	How effective do you believe your mechanism is at including all relevant agencies?	45	2	0
Leverage Resources and Information	How effective do you believe your mechanism is at providing you with tools, technologies, or other resources needed to conduct your duties?	35	12	0
	How well would you say information flows through your mechanism, both within the mechanism itself and to and from your agency?	44	3	0
	How effective would you say information sharing is outside of your information sharing mechanism?	14	12	21

<sup>1</sup>Note that for Department of Justice agencies, we only interviewed supervisory staff. For further information about our selection of interview participants, see appendix I for our objectives, scope, and methodology.

Appendix V: Results of Interviews with Selected Collaborative Group Members

Leading interagency collaboration practices				
	Questions on leading interagency collaboration practices <sup>a</sup>	Very effectively <sup>b</sup>	Somewhat effectively	Not applicable
	How effective would you say information sharing is with foreign partners, both inside and outside of your information sharing mechanism?	32	5	10
	How effectively would you say your agency contributes to your mechanism's mission?	43	3	1
	How effectively would you say your mechanism uses criminal investigative data that you collect and provide?	39	7	1

Source: GAO analysis of comments from selected agency staff. | GAO-25-106568

Note: We interviewed a nongeneralizable sample of 46 supervisory and nonsupervisory staff from eight different agencies involved in five different law enforcement and intelligence collaborative groups. One interviewee provided two sets of responses—one on behalf of each of two collaborative groups in which this interviewee participates—resulting in a total of 47 sets of responses to the interview questions. The interviewees included five El Dorado Task Force participants, seven IOC-2 participants, seven Joint Criminal Opioid and Darknet Enforcement team participants, 17 OCEDEF Fusion Center participants, and 11 Special Operations Division participants. We asked one or more questions related to eight categories of leading interagency collaboration practices and key considerations for implementation identified by GAO in Government Performance Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges. [GAO-23-105520](#) (Washington, D.C.: May 24, 2023).

<sup>a</sup>Another leading interagency collaboration practice identified by GAO is to develop and update written guidance and agreements. Based on key considerations identified for that practice, we asked interviewees about what, if any, guidance is in place governing their interactions with partner agencies in their collaborative groups. Because this was an open-ended question, we did not include it in the above table, as responses to these questions were recorded through closed-ended responses (e.g., very effective, somewhat effective, etc.). We recorded the interviewees' responses to this question and discussed the responses in this report.

<sup>b</sup>Response categories for all questions included 5-point Likert scales. The scale relating to effectiveness included: very effective, somewhat effective, neither effective nor ineffective, somewhat ineffective, or very ineffective. The scale relating to clarity—which applies only to the question posed under "Identify and Sustain Leadership"—included very clearly, somewhat clearly, neither clearly nor unclearly, somewhat unclearly, very unclearly. Since no interviewees provided any of the latter three responses (very or somewhat effective/very or somewhat clearly), we only present the first two in the table. Some interviewees explained that certain questions were not applicable to them in their specific roles, so we recorded their responses as "Not applicable." See Appendix I, Objectives, Scope, and Methodology, for more details.

# Appendix VI: Comments from the Department of State

United States Department of State  
Comptroller  
Washington, DC 20520

October 10, 2024

Kimberly Gianopoulos  
Managing Director  
International Affairs and Trade  
Government Accountability Office  
441 G Street, N.W.  
Washington, D.C. 20548-0001

Dear Ms. Gianopoulos:

We appreciate the opportunity to review your draft report, "ILLICIT FINANCE: Agencies Could Better Assess Progress in Countering Criminal Activity." GAO Job Code 106568.

The enclosed Department of State comments are provided for incorporation with this letter as an appendix to the final report.

Sincerely,

James A. Walsh

Enclosure:

As stated

cc: GAO - Triana McNeil  
OIG - Norman Brown

Department of State Comments on Draft GAO Report

ILLICIT FINANCE: Agencies Could Better Assess Progress in Countering Criminal Activity  
(GAO-25-106568SU, GAO Code 106568)

Thank you for the opportunity to comment on the GAO draft report, "Illicit  
Finance: Agencies Could Better Assess Progress in Countering Criminal

Activity.” The Department of State appreciates the extensive work the GAO has completed to review efforts to counter illicit finance and corruption activities.

Recommendation 4: The Secretary of State, in consultation with USAID and the National Security Council, should establish joint goals and a method to assess the Presidential Initiative for Democratic Renewal.

Department Response: The Department concurs with the intent of the recommendation. The Department respectfully notes that the Presidential Initiative for Democratic Renewal (PIDR) is substantially broader than illicit finance- and anti-corruption focused issues. The PIDR spans the interagency and covers policies and programs across five democracy- and human rights- focused areas, one of which is “fighting corruption.” With this clarification, the Department believes this recommendation has been satisfied through existing channels of strategic planning and reporting.

With respect to the anti-corruption and illicit finance elements of the PIDR, the Department, in collaboration with USAID, has a shared approach to reporting under strategic objectives and performance goals focused on anti- corruption in the FY 2022-2026 Joint Strategic Plan and the implementation plan of the U.S. Strategy on Countering Corruption, both of which incorporate and reflect the anti-corruption initiatives and programs under PIDR. Additionally, PIDR programs have goals and performance metrics in line with broader strategic objectives. The Performance Plan and Report (PPR) also includes narrative key issue reporting to capture progress for anti- corruption and illicit finance elements of the PIDR.

# Appendix VII: Comments from the United States Agency for International Development

October 16, 2024

Ms. Triana McNeil  
Director, Homeland Security and Justice  
U.S. Government Accountability Office  
441 G Street, N.W.  
Washington, D.C. 20226

Re: Illicit Finance: Agencies Could Better Assess Progress in Countering Criminal Activity (GAO-25-106568)

Dear Ms. McNeil:

I am pleased to provide the formal response of the U.S. Agency for International Development (USAID) to the draft report produced by the U.S. Government Accountability Office (GAO) titled, *Illicit Finance: Agencies Could Better Assess Progress in Countering Criminal Activity* (GAO-25-106568SU). The report has one recommendation for USAID and USAID concurs with this recommendation.

USAID remains committed to assessing our efforts towards the relevant strategies and efforts referenced in the draft report, including the Presidential Initiative for Democratic Renewal (PIDR). As noted throughout the engagement process, USAID has advanced our efforts to monitor and report on our progress toward the relevant strategies and efforts referenced in the draft report, including PIDR.

I am transmitting this letter and the enclosed comments from USAID for inclusion in the GAO's final report. Thank you for the opportunity to respond to the draft report, and for the courtesies extended by your staff while conducting this engagement. We appreciate the opportunity to participate in the complete and thorough assessment of progress towards strategies and efforts related to illicit finance.

Sincerely,

Colleen Allen  
Assistant Administrator Bureau for Management

Enclosure: a/s

COMMENTS BY THE U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT ON THE DRAFT REPORT  
PRODUCED BY THE U.S. GOVERNMENT ACCOUNTABILITY OFFICE (GAO) TITLED, *Illicit*

*Finance: Agencies Could Better Assess Progress in Countering Criminal Activity* (GAO-25-106568SU)

The U.S. Agency for International Development (USAID) would like to thank the U.S. Government Accountability Office (GAO) for the opportunity to respond to this draft report. We appreciate the extensive

work of the GAO engagement team, and the specific findings that will help USAID achieve greater effectiveness in assessing progress in countering criminal activity, including actions to implement the Presidential Initiative for Democratic Renewal (PIDR).

There was one recommendation for USAID.

Recommendation 3: The USAID Administrator, in consultation with the Department of State and the National Security Council, should establish joint goals and a method to assess progress for implementing the Presidential Initiative for Democratic Renewal.

USAID agrees with this recommendation and commits to collaborating with State and the NSC to establish joint PIDR goals and a method to assess progress for implementing PIDR.

USAID currently assesses progress through our robust performance monitoring processes and reports progress through the Performance Plan and Report (PPR). Additionally, USAID, Department of State (DOS), and the National Security Council (NSC) meet every two weeks to discuss, among other items, our respective PIDR actions. This collaboration enhances our ability to share our respective agencies actions, goals, and monitoring and evaluation progress. USAID will continue to work through these monitoring mechanisms and collaborative partnership to improve and further establish methods to assess progress for PIDR implementation.

USAID would like to once again thank the GAO for the opportunity to respond to this draft report. We appreciate the extensive work of the GAO engagement team, and the specific findings that will help USAID achieve greater effectiveness in efforts related to addressing illicit finance.

## Appendix VIII: Comments from the United States Postal Inspection Service

Gary R. Barksdale  
Chief Postal Inspector  
United States Postal Inspection Service

October 10, 2024

Triana McNeil  
Director, Homeland Security and Justice  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548-0001

SUBJECT: Draft report review of Illicit Finance: Agencies Could Better Assess Progress in Countering Criminal Activity (GAO-25-106568SU)

Dear Ms. McNeil:

Thank you for the opportunity to review and comment on the draft United States Government Accountability Office (GAO) report to Congressional Requesters titled: Illicit Finance: Agencies Could Better Assess Progress in Countering Criminal Activity (GAO- 25-106568SU)

We have reviewed the draft report and do not have additional technical comments. Sincerely,

Gary R. Barksdale

cc: USPS Corporate Audit Response Management

# Appendix IX: GAO Contact and Staff Acknowledgments

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## GAO Contact

Triana McNeil, (202) 512-8777 or [McNeilT@gao.gov](mailto:McNeilT@gao.gov)

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## Staff Acknowledgments

In addition to the contact name above, the following individuals made key contributions to this report: Joseph P. Cruz (Assistant Director), Adam Couvillion (Analyst-in-Charge), Richard Catherina, Michael Clements, Willie Commons III, Dominick Dale, Elizabeth Dretsch, David Lutter, Kelly Miller, Elizabeth Poulsen, Norma-Jean Simon, Janet Temko-Blinder, Rich Tsuhara, and Kellen Wartnow.



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## Public Affairs

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## Strategic Planning and External Liaison

Stephen J. Sanford, Managing Director, [spel@gao.gov](mailto:spel@gao.gov), (202) 512-4707

U.S. Government Accountability Office, 441 G Street NW, Room 7814, Washington, DC 20548