



February 2021

# FIREARMS TRAFFICKING

## U.S. Efforts to Disrupt Gun Smuggling into Mexico Would Benefit from Additional Data and Analysis



A Century of Non-Partisan Fact-Based Work

# GAO@100 Highlights

Highlights of [GAO-21-322](#), a report to congressional requesters

## Why GAO Did This Study

The U.S. *Southwest Border Counternarcotics Strategy: 2020* identified the trafficking of firearms from the U.S. into Mexico as a threat to the safety and security of both countries. The Mexican government has estimated that 200,000 firearms are smuggled from the United States each year.

GAO was asked to report on U.S. efforts to counter firearms trafficking to Mexico. This report examines (1) the extent of U.S. agencies' knowledge about firearms trafficking to Mexico and (2) U.S. agencies' efforts to disrupt this trafficking and the extent to which they have assessed those efforts. GAO reviewed firearms tracing data, related analysis, and program information for fiscal years 2014 through 2020. GAO also interviewed U.S. and Mexican officials.

This is a public version of a sensitive report that GAO issued in December 2020.

## What GAO Recommends

GAO is making eight recommendations, including recommending that ATF and ICE analyze additional information about the trafficking of U.S.-sourced firearms to Mexico and that ATF, ICE, CBP, and State develop performance measures to assess the results of their efforts to disrupt this trafficking. The agencies concurred with GAO's recommendations.

View [GAO-21-322](#). For more information, contact Chelsa Kenney at (202) 512-2964 or [kenneyc@gao.gov](mailto:kenneyc@gao.gov).

February 2021

## FIREARMS TRAFFICKING

### U.S. Efforts to Disrupt Gun Smuggling into Mexico Would Benefit from Additional Data and Analysis

## What GAO Found

Trafficking of U.S.-sourced firearms into Mexico is a national security threat, as it facilitates the illegal drug trade and has been linked to organized crime. The Department of Justice's Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) found that 70 percent of firearms reported to have been recovered in Mexico from 2014 through 2018 and submitted for tracing were U.S. sourced. However, ATF does not receive complete data about thousands of firearms, such as those recovered by Mexican states, because only Mexico's federal Attorney General's office submits trace requests to ATF. In addition, the Department of Homeland Security's (DHS) U.S. Immigration and Customs Enforcement (ICE) has identified smuggling trends by analyzing DHS data on 1,012 firearms seized in the U.S. by DHS agencies. However, ICE has not analyzed ATF data on 56,000 U.S. firearms recovered in Mexico. Additional data and analysis could enhance U.S. efforts to understand firearms sources and smuggling routes.

#### Examples of Firearms Recovered in Mexico



Source: GAO. | GAO-21-322

U.S. agencies have undertaken a number of efforts to disrupt firearms trafficking to Mexico—including several recently established efforts as well as prior and ongoing ones—but are unable to assess progress toward this goal.

- In April 2020, ATF established Operation Southbound to coordinate with other agencies to disrupt firearms trafficking to Mexico. ATF also conducts investigations related to Mexico.
- In fiscal year 2020, ICE and DHS's U.S. Customs and Border Protection (CBP) established a joint operation to intercept firearms being smuggled to Mexico. ICE and CBP also conduct other efforts related to this issue. For example, in fiscal years 2015 through 2017, ICE-led taskforces seized 1,104 firearms along the southwest border. In fiscal years 2014 through 2019, CBP seized an annual average of 115 firearms at the border, and in the first 10 months of fiscal year 2020, CBP increased outbound inspection at some ports of entry and seized 321 firearms.
- The Department of State (State) helps lead a working group to coordinate these and other U.S. efforts with the government of Mexico. State also provided \$54 million in fiscal years 2015 through 2019 to help build Mexico's capacity to disrupt trafficking through, for example, forensics training, inspection equipment, and canines trained for weapons detection.

However, none of the agencies have fully developed performance measures for their efforts to disrupt firearms trafficking to Mexico, and thus they have limited ability to assess progress. Identifying performance measures—including goals, indicators, targets, and time frames—would enhance their ability to optimize the use of U.S. government resources to address this threat to U.S. national security.

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## Abbreviations

ATF	Bureau of Alcohol, Tobacco, Firearms and Explosives
BEST	Border Enforcement Security Taskforce
CBP	U.S. Customs and Border Protection
DHS	Department of Homeland Security
DOJ	Department of Justice
HSI	Homeland Security Investigations
ICE	U.S. Immigration and Customs Enforcement
INL	Bureau of International Narcotics and Law Enforcement Affairs
State	Department of State
TCIU	transnational criminal investigative unit
TCO	transnational criminal organization

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February 22, 2021

The Honorable Dick Durbin  
Chairman  
Committee on the Judiciary  
United States Senate

The Honorable Gregory W. Meeks  
Chairman  
Committee on Foreign Affairs  
House of Representatives

Violent crime perpetrated by transnational criminal organizations (TCO) continue to raise security concerns on both sides of the U.S.–Mexican border. A 2020 Congressional Research Service report estimated that more than 150,000 people had been killed in Mexico as a result of organized crime since 2006.<sup>1</sup> U.S.-sourced firearms trafficked into Mexico—an estimated 200,000 each year, according to the Mexican government—are contributing to this violence by facilitating the illicit drug trade.<sup>2</sup>

The U.S. and Mexican governments have each acknowledged the threat posed by the trafficking of firearms from the United States to TCOs in Mexico.<sup>3</sup> The Mexican government has emphasized that combating firearms trafficking is among its top priorities with respect to the United States, according to Mexican officials. In February 2020, the U.S. government’s *Southwest Border Counternarcotics Strategy: 2020* identified the smuggling, trafficking, and illegal export of weapons from

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<sup>1</sup>Congressional Research Service, *Mexico: Organized Crime and Drug Trafficking Organizations* (Washington, D.C.: July 28, 2020). In our report, all years cited are calendar years (January–December) unless denoted as fiscal years (October–September).

<sup>2</sup>According to officials of the U.S. Departments of Justice, Homeland Security, and State, the Mexican government’s estimate of the number of firearms trafficked from the United States to Mexico annually is the best estimate available.

<sup>3</sup>“Firearms trafficking” refers to the diversion of guns from lawful commerce to the illegal market.

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the United States to Mexico as a threat to the safety and security of both countries.<sup>4</sup>

You asked us to report on U.S. efforts to counter firearms trafficking to Mexico.<sup>5</sup> This report examines (1) the extent of U.S. agencies' knowledge of firearms trafficking to Mexico and (2) U.S. agencies' efforts to disrupt firearms trafficking to Mexico and the extent to which they have assessed those efforts.

This is a public version of a sensitive report that we issued in December 2020.<sup>6</sup> The Department of Justice (DOJ) and Department of Homeland Security (DHS) deemed some components of our December report to be law enforcement–sensitive information, which must be protected from public disclosure. Therefore, this report omits information about certain aspects of DOJ's firearms trafficking investigations. This report also omits details of a joint operation conducted by DHS's U.S. Immigrations and Customs Enforcement (ICE) and U.S. Customs and Border Protection (CBP). Although the information it provides is more limited, this report addresses the same objectives and uses the same methodology as the sensitive report.

To address our objectives, we reviewed U.S. agency documents and interviewed officials of DOJ, DHS, and the Department of State (State). To examine U.S. agencies' understanding of firearms trafficking to Mexico, we reviewed firearms trafficking reports produced by DOJ's Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and firearms smuggling reports produced by DHS's ICE from 2014 through 2020. We also interviewed officials in various DOJ and DHS intelligence offices.

To examine U.S. efforts to disrupt firearms trafficking to Mexico, we reviewed plans and reports issued by DOJ, DHS, and State. We

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<sup>4</sup>Office of National Drug Control Policy, *National Drug Control Strategy. Southwest Border Counternarcotics Strategy: 2020* (February 2020).

<sup>5</sup>This report updates information in two reports that we issued in 2016. See GAO, *Firearms Trafficking: U.S. Efforts to Combat Firearms Trafficking to Mexico Have Improved, but Some Collaboration Challenges Remain*, [GAO-16-223](#) (Washington, D.C.: Jan. 11, 2016); and *Building Partner Capacity: U.S. Agencies Can Improve Monitoring of Counter-Firearms Trafficking Efforts in Belize, Guatemala, and Mexico*, [GAO-16-235](#) (Washington, D.C.: Jan. 13, 2016).

<sup>6</sup>GAO, *Firearms Trafficking: U.S. Efforts to Disrupt Gun Smuggling into Mexico Would Benefit From Additional Data and Analysis*, [GAO-21-134SU](#) (Washington, D.C.: Dec. 16, 2020).

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interviewed U.S. law enforcement officials, including ATF officials investigating firearms trafficking, ICE officials investigating firearms smuggling to Mexico, and CBP officials interdicting weapons at the border. We also interviewed State officials responsible for managing U.S. foreign assistance related to building Mexico's capacity to investigate and interdict firearms. In Mexico, we interviewed U.S. and Mexican government officials and conducted site visits to forensic laboratories in the states of Jalisco and Puebla.

The performance audit on which this report is based was conducted from September 2019 to December 2020 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. We subsequently worked with DOJ and DHS, from December 2020 to February 2021, to prepare this version of the original sensitive report for public release. This public version was also prepared in accordance with generally accepted government auditing standards.

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## Background

### U.S. National Security Threat from Firearms Trafficking to Mexico

Trafficking of U.S.-sourced firearms to Mexico is a U.S. national security threat, in part because it facilitates the illegal drug trade. A 2017 executive order noted that TCOs, including drug cartels, threaten the safety of the United States and its citizens.<sup>7</sup> The order stated a policy to strengthen federal law enforcement to thwart TCOs engaged in illegal smuggling and trafficking of weapons, among other things.

In Mexico, weapons smuggled from the United States often end up in the hands of TCOs or other criminals, where they can be used against law enforcement officers and civilians, according to the 2020 *Southwest Border Counternarcotics Strategy*. According to a 2010 report by DOJ's Inspector General, drug traffickers in Mexico turned to the United States as a primary source of weapons in part because Mexican law severely restricts gun ownership.<sup>8</sup> According to a 2020 ATF report, the number of

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<sup>7</sup>Exec. Order No. 13773, 82 Fed. Reg. 10,691 (Feb. 14, 2017).

<sup>8</sup>Department of Justice, Office of the Inspector General, *Review of ATF's Project Gunrunner* (Washington, D.C.: November 2010).



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TCOs and splinter groups operating in Mexico grew from eight in 2015 to 13 in 2018 as large cartels fractured, increasing instability and violence.<sup>9</sup>

### Transnational Criminal Organizations (TCO) and .50 Caliber Rifles

According to U.S. and Mexican officials, TCOs are interested in obtaining .50-caliber rifles (pictured below) because these rifles are powerful enough to disable a vehicle engine and penetrate vehicle or personal armor, posing a significant threat to Mexican security forces. The Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) officials noted that these rifles are not regulated differently than other rifles and can be purchased in retail stores. ATF reported that .50 caliber rifles account for about 0.5 percent of weapons recovered in Mexico and traced to the United States that were recovered within 3 years of initial purchase.



Source: GAO and ATF. | GAO-21-322

According to the *Southwest Border Counternarcotics Strategy*, Mexico continues to experience high rates of crime and violence due to the intense competition among TCOs to dominate lucrative smuggling corridors. Many of the TCOs that traffic drugs into the United States are also involved in the southbound flow of illicit drug proceeds and illegal weapons across the U.S. border. Throughout the United States, TCOs and subsidiary organizations, including drug cartels, derive revenue through widespread illegal conduct. Such conduct includes acts of violence and abuse that threaten the safety of U.S. citizens and show a wanton disregard for human life, according to the 2017 executive order.<sup>10</sup>

TCOs use firearms, ammunition, and explosives to protect their trafficking routes, drug processing locations, geographic drug trafficking areas, and illicit profits. According to DOJ, DHS, and State reports, TCOs have orchestrated sophisticated attacks on Mexican security forces, with increasing use of .50 caliber rifles, modified fully automatic rifles, and belt-fed machine guns to counter Mexican security forces. According to State reporting, in March 2018, a TCO ambushed Mexican security units in three locations in Nuevo Laredo, using at least 15 vehicles—many with improvised armor—and a .50 caliber gun capable of piercing the Mexican units' armored vehicles.

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## U.S. Agencies' Responsibilities Related to Firearms Trafficking to Mexico

Several U.S. departments and agencies have responsibilities related to disrupting firearms trafficking to Mexico. DOJ, primarily through ATF, is responsible for enforcing U.S. firearms laws and regulations, including commerce in firearms. DHS, primarily through ICE Homeland Security Investigations (HSI) and CBP, is responsible for enforcing laws related to the export of firearms from the United States and for interdiction at U.S. borders. State is responsible for managing the bilateral relationship with Mexico including providing U.S. assistance to Mexico.

### DOJ's Responsibilities

DOJ's ATF is responsible for investigating violations of federal firearms laws and regulations, including the diversion of firearms from legitimate

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<sup>9</sup>Bureau of Alcohol, Tobacco, Firearms and Explosives, *CY2018 – Mexico Firearms Tracing and Transnational Organized Crime Impact Assessment* (Washington, D.C.: 2020).

<sup>10</sup>Exec. Order No. 13773, §1.

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commerce, and for enforcing these laws and regulations.<sup>11</sup> ATF is responsible for conducting domestic firearms trafficking investigations, including investigating firearms thefts and “straw purchases” (i.e., unlawful firearms purchases by third parties) and inspecting federal firearms licensees.<sup>12</sup>

In the United States, ATF’s responsibilities include investigating and arresting individuals and organizations that illegally supply firearms to prohibited individuals and TCOs.<sup>13</sup> ATF firearms investigations are initiated on the basis of credible leads, often received from its National Tracing Center, foreign partner governments, other U.S. agencies, and state and local agencies. ATF’s Office of Strategic Intelligence and Information has produced reports on U.S.-sourced firearms recovered in Mexico. In Mexico, ATF is responsible for working with Mexican law enforcement and other U.S. agencies to investigate criminal and regulatory violations of U.S. federal firearms law and assisting Mexican law enforcement with tracing firearms recovered in Mexico, according to ATF documentation.

ATF is also responsible for tracing firearms and analyzing results for investigative leads. ATF’s National Tracing Center assists domestic and foreign law enforcement agencies by tracing, at an agency’s request, the

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<sup>11</sup>Other DOJ components reported that they had no efforts focused on firearms trafficking. Officials at the Federal Bureau of Investigation and the Drug Enforcement Administration told us that they do not investigate firearms trafficking specifically but inform ATF about any firearms encountered during their investigations. Officials of the Executive Office for U.S. Attorneys told us that U.S. Attorneys’ Offices prosecute firearms violations but have no specific initiative aimed at prosecuting illegal firearms trafficking to Mexico. In November 2019, DOJ announced Project Guardian, focused on reducing gun violence in the United States. According to officials of the Executive Office for U.S. Attorneys, this initiative will likely include targeting of gun traffickers and straw purchasers connected with TCOs in Mexico for prosecution in U.S. districts where those individuals are identified.

<sup>12</sup>According to ATF, a straw purchase occurs when a person who is a convicted felon (or otherwise prohibited by federal law from purchasing a firearm) or who wishes to remain anonymous uses a third party, the straw purchaser, to execute the paperwork necessary to purchase a firearm from a federally licensed firearms dealer. Straw purchases violate 18 U.S.C. § 922(a)(6), which prohibits purchasers from knowingly making false oral or written statements or furnishing false identification intended to deceive licensed importers, manufacturers, or dealers as to the lawfulness of the sale.

<sup>13</sup>Federal law makes it unlawful for any person to sell or otherwise dispose of any firearms to certain categories of persons, including, among others, any person who has been convicted in any court of a crime punishable by imprisonment for a term exceeding 1 year; who is an unlawful user of, or addicted to, any controlled substance; or who is an alien illegally or unlawfully in the country. 18 U.S.C. §922(d).

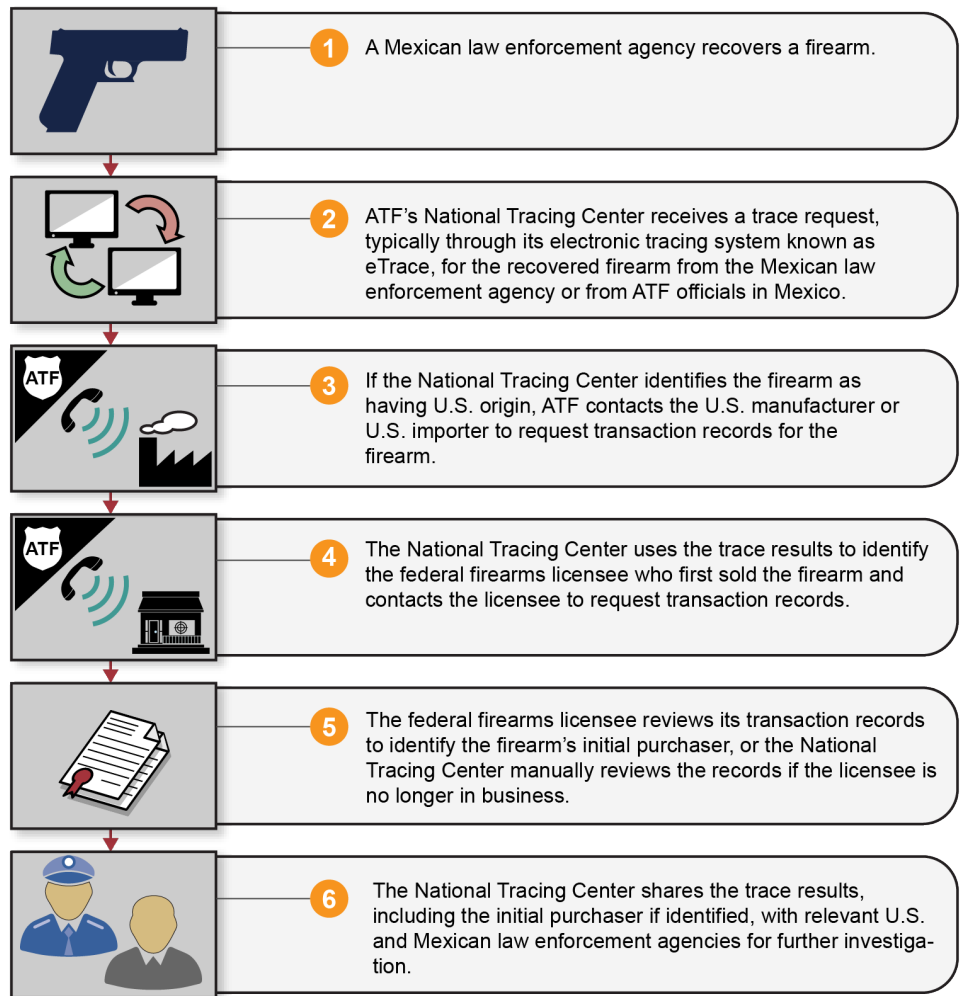
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origins of any firearm recovered during a criminal investigation to the firearm's first sale by a manufacturer or importer and, if information is available, to the firearm's initial retail purchaser.<sup>14</sup> (Fig. 1 shows ATF's process for tracing firearms recovered in Mexico and submitted for tracing.) The tracing process typically includes calling manufacturers and dealers to obtain information, according to ATF officials. The National Tracing Center shares the trace results (e.g., the name of the firearm's initial purchaser and the federal firearms licensee who sold it) with the law enforcement agency that submitted the request and ATF domestic field offices. The submitting agency and the field offices may conduct further investigations to determine the chain of events from initial purchase to recovery by law enforcement.

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<sup>14</sup>The National Tracing Center may not be able to identify the initial purchaser in some cases and may identify a more recent purchaser or an unlicensed purchaser in other cases.

**Figure 1: ATF's Process for Tracing a Firearm Recovered in Mexico to an Initial Purchaser**



Source: GAO analysis of Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) information. | GAO-21-322

Note: ATF's National Tracing Center is not always able to identify the initial purchaser and sometimes identifies a more recent purchaser or an unlicensed purchaser.

ATF and other law enforcement agencies use tracing results to identify the origin of firearms, firearms traffickers, and criminal networks. Through ATF's electronic tracing system known as eTrace, law enforcement agencies submit trace requests, monitor the progress of traces, retrieve completed trace results, and query firearms trace-related data. ATF receives hundreds of thousands of trace requests each year from about 7,000 law enforcement agencies around the world. On average, ATF

traced approximately 16,000 firearms that were reported recovered in Mexico each year from 2013 through 2018.

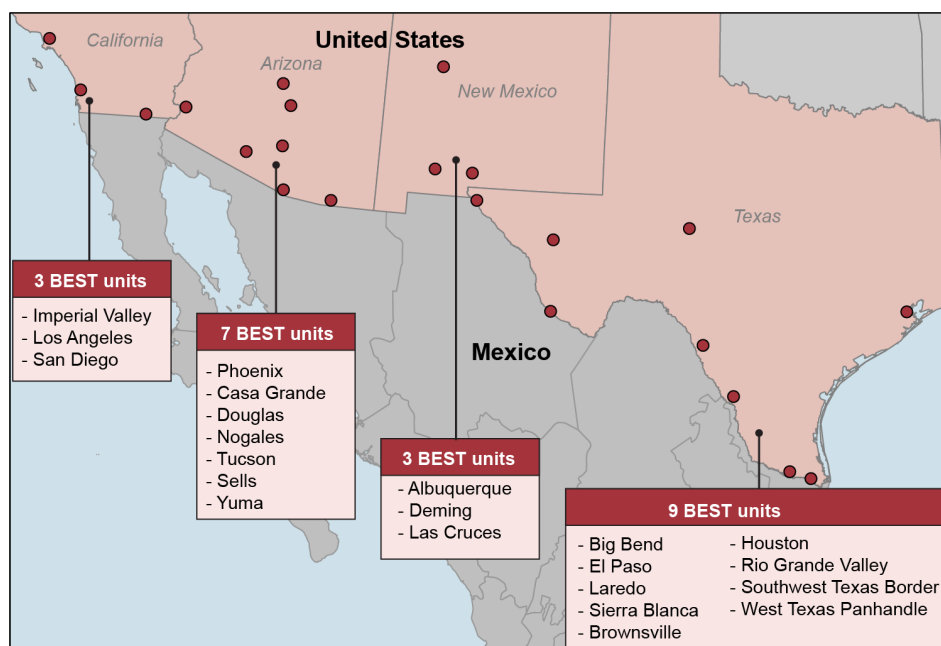
## DHS's Responsibilities

Two DHS components—ICE and CBP—have responsibilities related to firearms trafficking to Mexico.

### ICE Responsibilities

ICE's HSI is responsible for export control investigations, including investigations of firearms smuggling to Mexico. To carry out this responsibility, HSI leads multiagency Border Enforcement Security Taskforces (BEST) that target the illicit movement of people and contraband through border areas, in part to combat TCOs involved in the smuggling of firearms, drugs, and other contraband. CBP, ATF, and other law enforcement agencies participate in BEST units. As of May 2019, HSI had 72 BEST units deployed throughout the United States, including 22 along the southwest border (see fig. 2).

**Figure 2: HSI BEST Locations on the U.S.–Mexican Border as of September 2020**



Legend: BEST = Border Enforcement Security Taskforce.

Source: GAO analysis of Department of Homeland Security (DHS) Homeland Security Investigations (HSI) data. | GAO-21-322

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ICE HSI also conducts financial investigations to identify and dismantle TCOs, which may result in the seizing of networks' proceeds and related assets. In addition, HSI's Office of Intelligence analyzes and reports on firearms smuggling to Mexico. HSI works with U.S. and foreign law enforcement to identify and prosecute smugglers and Mexican TCOs and to seize illegal firearms and other dangerous weapons. In Mexico, HSI partners with Mexican law enforcement through transnational criminal investigation units (TCIU) that HSI has vetted. According to HSI, TCIUs consist of foreign law enforcement officials, customs officers, immigration officers, and prosecutors who receive ICE training and undergo strict background investigations to ensure joint efforts are not compromised.

### **CBP Responsibilities**

CBP is responsible for enforcing U.S. customs and trade laws. To carry out this responsibility, CBP's Office of Field Operations conducts inspections of articles, including firearms, being transported into and out of the United States, to ensure compliance with applicable U.S. law. The Office of Field Operations conducts temporary outbound inspections and targeted interdiction operations at official ports of entry, including the 28 land ports of entry along the U.S.–Mexican border (see fig. 3). According to CBP officials, temporary outbound inspections entail the inspection of outbound traffic at designated ports of entry to gather information about contraband smuggling, and targeted interdiction operations single out specific individuals or vehicles for additional inspection. CBP's U.S. Border Patrol monitors and conducts patrols between official ports of entry. Border Patrol also conducts interdictions of firearms, among other things, through its border patrol operations, often on the basis of BEST referrals, according to CBP officials.

**Figure 3: Locations of Official U.S. Land Ports of Entry on the U.S.–Mexican Border**



Source: GAO analysis of U.S. Customs and Border Protection (CBP) data. | GAO-21-322

CBP’s Office of Intelligence and CBP’s National Targeting Center provide intelligence to inform Office of Field Operations and Border Patrol efforts. They analyze and provide actionable intelligence to CBP officials at the border, including information about weapons crossing the border with Mexico. The National Targeting Center also shares some of this information with the Mexican government, according to CBP officials.

### State’s Responsibilities

State’s responsibilities include maintaining U.S. bilateral relations with Mexico and providing capacity-building assistance to Mexico, including assistance intended to address firearms trafficking. Several State components carry out these responsibilities.

- The **Bureau of Western Hemisphere Affairs** manages the U.S.–Mexican bilateral relationship, including general oversight of the U.S. Mission to Mexico. The mission includes representatives from many of the U.S. agencies involved in disrupting firearms trafficking to Mexico, including ATF, ICE, and CBP.
- The **Bureau of International Narcotics and Law Enforcement Affairs (INL)** manages law enforcement–related capacity-building

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assistance funded through the International Narcotics Control and Law Enforcement account. INL personnel in Mexico administer this assistance.

- The **Bureau of Political–Military Affairs** manages military-related capacity-building assistance, including the portion funded through the Nonproliferation, Antiterrorism, Demining, and Related–Conventional Weapons Destruction account. U.S. foreign service officers at the U.S. Embassy in Mexico monitor this assistance.

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## Mexican Agencies’ Responsibilities Related to Firearms Trafficking

In Mexico, both federal and state agencies have responsibilities related to firearms trafficking.

- **Mexican federal agencies.** According to Mexican officials, Mexico’s federal Attorney General’s Office (Fiscalía General de la República) is responsible for federal-level criminal investigations in Mexico, including most investigations of firearms trafficking. The federal Attorney General has regional offices throughout the country. In addition to having traditional external security responsibilities, Mexico’s army and navy are responsible for internal security, according to State documents. Mexico’s customs agency is part of Mexico’s Tax Administration Service (Servicio de Administración Tributaria) and is responsible for enforcing administrative rules, such as by collecting customs duties on imported items, but does not have law enforcement authorities, according to Mexican officials. According to these officials, the Mexican Secretariat for Security and Citizen Protection (Secretaría de Seguridad y Protección Ciudadana), created in 2018, is responsible for the recently established Mexican National Guard (Guardia Nacional). The National Guard has a broad mandate for providing security and has law enforcement authorities.
- **Mexican state agencies.** According to Mexican officials, each state Attorney General’s Office (Fiscalía General del Estado) is responsible for investigating crimes in its jurisdiction, including homicides and robbery, many of which involve firearms.



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## ATF Traced Most Firearms Reported Recovered in Mexico to the U.S., but ATF's and ICE's Knowledge of Sources and Trends Has Gaps

ATF determined that the majority of firearms reported to have been recovered in Mexico in 2014 through 2018 were from the United States, but ATF and ICE HSI do not receive or analyze additional data that could enhance their knowledge of firearms trafficking to Mexico. ATF receives firearms trace requests from the Mexican federal Attorney General's Office but does not receive requests from other Mexican federal or state agencies that also recover firearms. As a result, ATF lacks data about thousands of firearms recovered in Mexico. In addition, ATF has not analyzed other types of data that could improve its understanding of firearms trafficking to Mexico, such as data on firearms seized in the United States but intended for Mexico. HSI analyzed data on DHS seizures in the United States and determined that the U.S.–Mexican land border was the primary exit point from the United States for most smuggled firearms destined for Mexico. However, HSI's analyses do not include ATF data about firearms from the United States that were reported to have been recovered in Mexico, because ATF does not share trace data with HSI.

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## ATF Found Most Firearms Reported Recovered in Mexico in 2014-2018 Were U.S. Sourced but Does Not Receive Data on All Recovered Weapons or Analyze All Available Information

ATF Traced 70 Percent of the Reported Firearms to the U.S. but Lacks Complete and Timely Data on Unreported Weapons

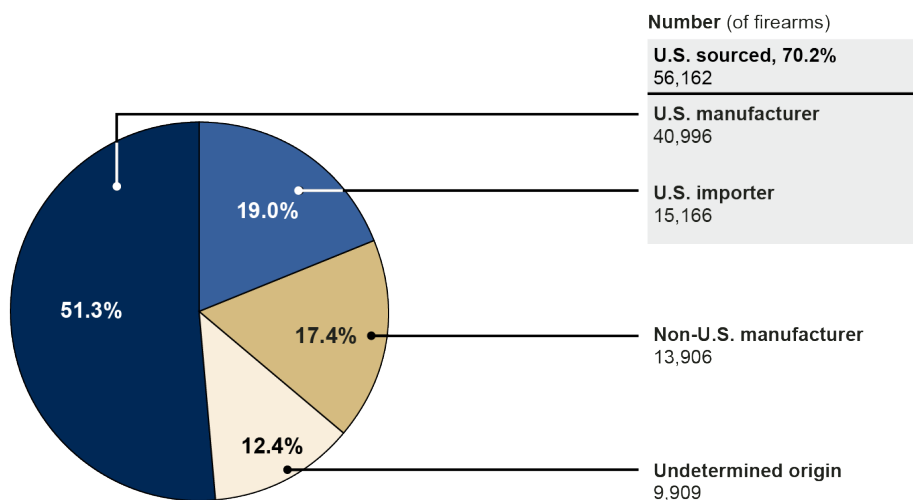
ATF analysis of tracing data found that 70 percent of firearms recovered in Mexico from 2014 through 2018 and submitted for tracing originated in the United States; however, ATF lacks complete and timely information about many other weapons recovered in Mexico during this period that were not submitted for tracing.<sup>15</sup> ATF traced approximately 80,000 firearms recovered in Mexico during this period and found that about

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<sup>15</sup>In 2016, we reported that the majority of firearms seized in Mexico and traced from 2009 through 2014 originated in the United States (see [GAO-16-223](#)). Although a significant number of seized weapons were not reported to ATF, U.S. officials in Mexico told us that the majority of weapons they saw in Mexico—including unreported weapons—were from the United States and that their experience indicated additional data on seized firearms would not greatly change the percentage.

56,000 were either manufactured in the United States or legally imported into this country by a federal firearms licensee (see fig. 4).

**Figure 4: Origins of Firearms Recovered in Mexico and Traced by ATF, 2014–2018**



**Total firearms recovered in Mexico and submitted for tracing = 79,977**

Source: GAO analysis of Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) data. | GAO-21-322

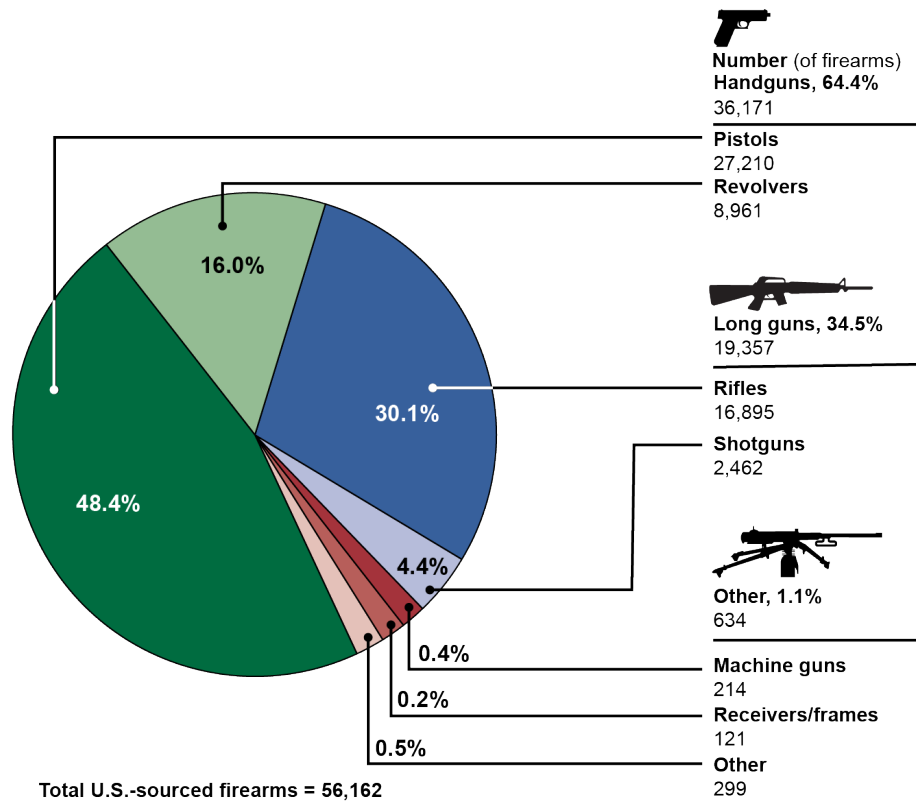
Notes: Because of rounding, the percentages for all firearms do not sum to 100 and the percentages for U.S.-sourced firearms do not sum to the subtotal shown.

ATF defines “U.S. sourced firearms” as firearms that it determines to have been manufactured in the U.S. or legally imported by a federal firearms licensee. “Non-U.S. manufacturer” refers to firearms for which a trace request indicated a foreign manufacturer and a U.S. firearms importer was either not listed or not required.

According to ATF data, the approximately 56,000 firearms that ATF traced to U.S. sources comprised several types, as shown in figure 5. About 36,000 (64.4 percent) were handguns (i.e., pistols and revolvers), which Mexican officials told us are commonly recovered in northwest Mexico, across the border from California. About 19,000 (34.5 percent) were long guns (i.e., rifles and shotguns), which Mexican officials told us are commonly recovered in northeast Mexico, across the border from Texas. Mexican officials told us that they were particularly concerned about .50 caliber rifles because of their range and ability to penetrate personnel and vehicle armor. Other firearms that ATF traced to the United

States included 214 machine guns (0.4 percent) and 121 firearm receivers or frames (0.2 percent).<sup>16</sup>

**Figure 5: Types of U.S.-Sourced Firearms Recovered in Mexico and Traced by ATF, 2014–2018**



Source: GAO analysis of Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) data. | GAO-21-322

Note: According to ATF, although a firearm trace request includes a description of the weapon, ATF may change the descriptor if it determines the firearm was misidentified. For example, if federal firearms licensee records showed that a firearm described as a machine gun was originally manufactured as a rifle, ATF would categorize it as a rifle even if it was later modified to function as a machine gun.

<sup>16</sup>The National Firearms Act defines a machine gun as any weapon that shoots, is designed to shoot, or can be readily restored to shoot automatically more than one shot without manual reloading, by a single function of the trigger. See 26 U.S.C. § 5845(b). A receiver is a firearm component that houses the operating parts, typically the bolt or bolt carrier group, the magazine well, and the trigger group. A frame or receiver by itself is classified as a firearm by definition under the Gun Control Act of 1968 and must contain identifying marks including a serial number. See 18 U.S.C. § 921(a)(3), 18 U.S.C. § 923(i).

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Although ATF has traced thousands of firearms recovered in Mexico, it lacks complete and timely information about thousands of other firearms recovered in Mexico but not submitted for tracing. ATF relies on Mexican federal and state agencies to provide information about, or access to, recovered firearms to inform its investigations and analyses. However, among Mexican government agencies, only the federal Attorney General's Office can submit trace requests to ATF through eTrace; other federal agencies and state agencies can provide information about recovered firearms to the federal Attorney General's Office to submit through eTrace. As we reported in 2016 and confirmed with U.S. and Mexican officials in February 2020, other Mexican federal agencies and state Attorney Generals' Offices do not have eTrace accounts, because the Mexican government had restricted eTrace access to the federal Attorney General's Office.<sup>17</sup>

Because only the federal Attorney General's Office can submit information about recovered firearms through eTrace, ATF does not receive complete or timely information about firearms recovered by other Mexican federal agencies or by Mexican state Attorney Generals' Offices. According to U.S. and Mexican officials, these other agencies may not share information about recovered firearms with the federal Attorney General's Office or, in the case of state Attorney Generals' Offices, may not share it until prosecutions are complete. According to Mexican state officials, completing state prosecutions sometimes takes more than a year. (Fig. 6 shows an example of a firearm held by a Mexican state Attorney General's Office.) U.S. and Mexican officials told us that the Mexican military and other Mexican federal agencies also do not report all recovered firearms to the federal Attorney General's Office. U.S. officials attributed this, in part, to the fact that officials in these agencies typically focus more on seizing firearms than on investigating related crimes.

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<sup>17</sup>In 2016, we reported that, according to Mexican officials, the decision to limit eTrace access to the Mexican federal Attorney General's office was intended to provide the Mexican government with more effective control over the information associated with eTrace and to support a central repository of evidence related to federal crimes such as firearms trafficking. However, U.S. officials and some Mexican authorities said that limiting eTrace access to a single government entity had restricted opportunities for bilateral collaboration. Some U.S. officials based in Mexico similarly noted that limiting access to eTrace meant that not all firearms recovered by Mexican authorities were traced. See [GAO-16-223](#).

**Figure 6: Example of a Firearm Recovered in Mexico and Held by a Mexican State Attorney General's Office**



Source: GAO. | GAO-21-322

Mexican state agencies sometimes give ATF officials access to recovered firearms so that the officials can submit them for tracing. However, ATF officials estimated that many thousands of firearms that have been recovered in Mexico have not been submitted for tracing. In February 2020, ATF officials in Mexico told us that they were aware of several thousand firearms held by a few Mexican states but were unaware of how many firearms other Mexican states might be holding. In an April 2020 document, ATF estimated that 25,000 firearms recovered by Mexican federal and state agencies had not been submitted by Mexican federal and state agencies for tracing. ATF identified an additional 13,000 firearms at one Mexican military installation, according to the document.

ATF documentation has indicated that access to more complete tracing information would enable it to better identify trends and patterns related to firearms trafficked to Mexico. For example, ATF reported in 2020 that although homicides by firearms in Mexico had increased by 16 percent, the number of firearms trace requests from the Mexican government had increased by only 6.5 percent. ATF's analysis noted a possible connection between this disparity and Mexico's not reporting all firearms. According to ATF, the lack of information about untraced firearms throughout Mexico results in lost opportunities to identify trafficking networks and stem the flow of arms.

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U.S. and Mexican officials said in February 2020 that they had initiated efforts to enable better reporting of firearms recovered in Mexico. According to U.S. officials, the U.S. Embassy had that month started outreach to 10 of the 32 Mexican states to obtain access to firearms those states had seized and to provide the states with eTrace accounts. U.S. officials in Mexico told us that the federal Attorney General's Office agreed with this approach. The U.S. Ambassador also sent letters to some Mexican governors to initiate a discussion. In addition, ATF plans to provide training to help ensure that Mexican state officials submit complete and accurate tracing requests. According to ATF and State officials, ATF and INL are developing plans to provide this training through an existing capacity-building program.

In April 2020, ATF released a strategy outlining efforts to reach out to Mexican states, the Mexican military, and the Mexican National Guard; however, the strategy did not establish time frames for conducting this outreach, establishing eTrace accounts, or providing the related training to Mexican officials. In August 2020, ATF officials confirmed that the agency had not yet established time frames, in coordination with State, for reaching out to the remaining Mexican states and other agencies. The officials also stated that ATF's planning for the outreach and training was on hold, because ATF personnel had returned to the United States owing to safety concerns related to the COVID-19 pandemic.

The 2020 *Southwest Border Counternarcotics Strategy* states that U.S. agencies need to improve information sharing with international partners to better inform investigation and interdiction efforts. Moreover, standard practices in program and project management call for, among other things, developing a plan to execute specific projects needed to obtain defined results within a specified time frame.<sup>18</sup> Establishing time frames for conducting outreach to Mexican counterparts, establishing eTrace accounts, and completing the necessary training would help ensure that ATF prioritizes these efforts and obtains timely access to information about U.S. firearms recovered in Mexico.

#### ATF Has Identified Trends Based on Firearms Traced to Initial Purchasers but Has Not Analyzed Other Types of Data

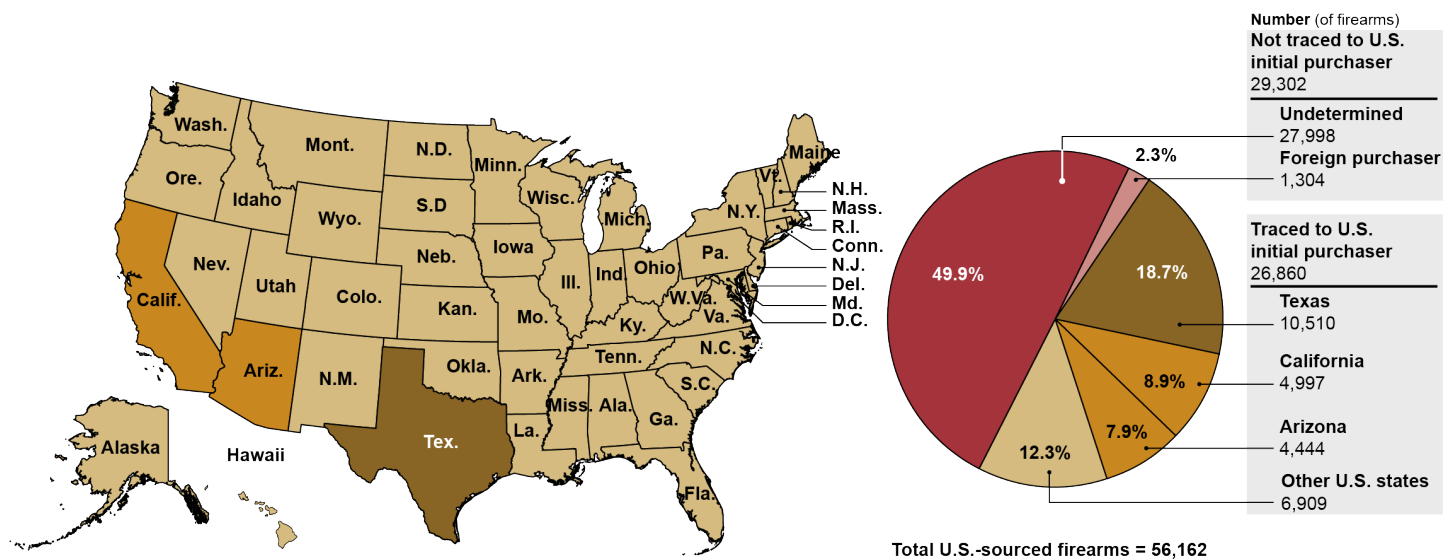
Although ATF has analyzed some tracing data to identify where and how U.S.-sourced firearms recovered in Mexico were purchased, ATF has not analyzed additional types of data—such as data on firearms seized in the United States but intended for Mexico—that could enhance its understanding of how U.S. firearms are being diverted. ATF's analysis of

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<sup>18</sup>Project Management Institute, *The Standard for Program Management* (2013).

data on firearms recovered in Mexico from 2014 to 2018 that it traced to initial purchasers found that most U.S.-sourced firearms acquired by TCOs are (1) initially purchased in U.S. states along the U.S.–Mexican border and (2) purchased primarily through the secondary market.<sup>19</sup> ATF based its first conclusion on analysis of about 27,000 firearms that it traced to initial purchasers primarily in Texas, California, and Arizona (see fig. 7). ATF based its second conclusion on analysis showing that about 24,000 of these firearms had a “time to crime” of more than 1 year.<sup>20</sup> According to ATF’s analysis, firearms with a shorter time to crime have a better chance of being traced to purchasers, because those firearms are less likely to have been purchased on the secondary market.

**Figure 7: Locations of Initial Purchasers of U.S.-Sourced Firearms Recovered in Mexico and Traced by ATF, 2014–2018**



Source: GAO analysis of Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) data. | GAO-21-322

Because of concerns about data reliability, ATF has not analyzed information about the approximately 29,000 U.S.-sourced firearms for which it could not identify initial purchasers—that is, more than half of the firearms it traced to the United States. According to ATF, unsuccessful

<sup>19</sup>“Secondary market” refers to previously owned weapons purchased through consignment (including pawn shops), collectors, person-to-person transactions, or Internet sales.

<sup>20</sup>According to ATF, “time to crime” refers to the period (measured in days) between the first retail sale of a firearm and the recovery of that firearm by law enforcement during the firearm’s use, or suspected use, in a crime.

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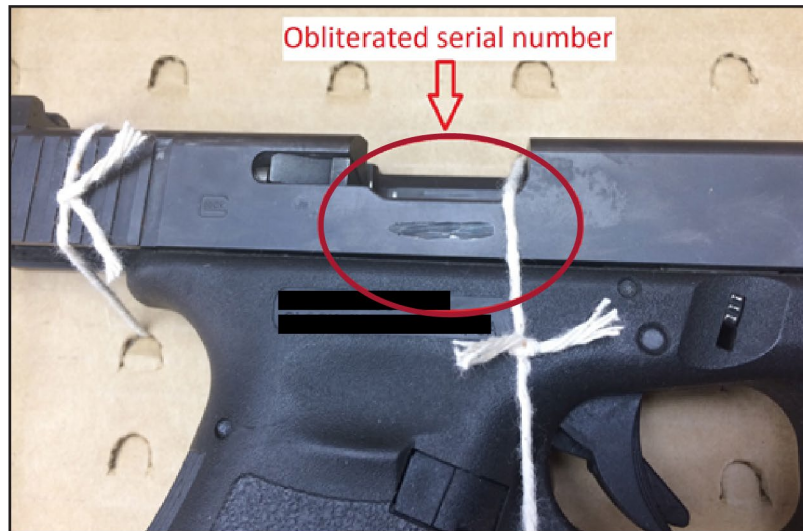
and incomplete traces constrain its ability to identify the point—for example, in the distribution chain or after retail sale—at which firearms were diverted from legal commerce. ATF officials told us that improved outreach to, and training for, Mexican law enforcement would likely improve data submitted in trace requests. ATF’s analysis identified common reasons why it is unable to trace a firearm to its initial purchaser, including the following:

- Data supplied by the law enforcement agency requesting the trace, such as the firearm model or serial number, were missing or invalid (43 percent of incomplete traces).
- Federal firearms licensee records were incomplete, missing, or illegible (34 percent of incomplete traces).
- The firearm was manufactured before the Gun Control Act of 1968 established marking and record-keeping requirements (14 percent of incomplete traces).

ATF data for 2014 through 2018 indicate that the serial number was missing from trace requests for 28 percent of firearms that ATF was unable to trace to an initial purchaser. ATF data on these incomplete traces did not show whether the serial numbers were missing because of incomplete data entry by the requesting law enforcement agency or because the numbers had been obliterated. According to a separate ATF analysis, serial numbers had been obliterated on about 5 percent of firearms reported recovered in Mexico in 2018 (see fig. 8 for an example).



**Figure 8: Obliterated Serial Number on a Firearm Recovered in Mexico**



Source: GAO. | GAO-21-322

However, ATF also has not analyzed other data to further understand how U.S.-sourced firearms are diverted to Mexico and to corroborate or supplement its analysis of firearms recovered in Mexico. For example, ATF has not analyzed information about firearms intended for Mexico that it seized in the United States. According to ATF officials, its domestic investigations and related data systems focus on collecting information related to violations within its authorities, which do not include illegal export; as a result, its investigations and data systems do not systematically identify seizures intended for Mexico. ATF officials told us that the agency plans to begin tracking that information as part of an initiative begun in 2020.

In addition, according to ATF documents, the bureau has not analyzed data on firearms intended to be smuggled to Mexico but seized by other U.S. agencies, such as CBP and ICE, before reaching Mexico. Such analysis might include, for example, analyzing trace data on firearms recovered by CBP at the U.S.–Mexican border, to corroborate ATF’s analysis of firearms recovered in Mexico. In August 2020, ATF collaborated with CBP to produce a one-page overview of trends in the movement of weapons across the border. The overview used ATF tracing data to describe background, high-level trends and used CBP data to show seizures in 2020. However, ATF has not analyzed data on CBP seizures to determine how those firearms were diverted. According to

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ATF, its analysis has focused on initial purchasers of firearms recovered in Mexico because that information is most likely to result in an ATF investigation.

Although ATF has identified some trends related to firearms trafficking to Mexico, it is missing opportunities to expand its analysis. According to ATF documentation, the objective of its intelligence assessments is to identify firearms trafficking trends and improve intelligence collection, sharing, and training pertaining to TCOs and firearms trafficking investigations. Accurate firearms data are a critical component of strategic targeting and investigative decisions, according to ATF. The *2019 National Intelligence Strategy* states that strategic intelligence requires developing and maintaining a deep understanding of the strategic environment, including transnational organized crime, to support U.S. national security policy and planning decisions. According to *Standards for Internal Control in the Federal Government*, relevant data should be obtained from internal and external sources in a timely manner based on the identified information requirements.<sup>21</sup> Analyzing data on firearms seized in the United States would help the agency better understand how U.S.-sourced firearms are being illicitly diverted from the United States to Mexico.

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### ICE HSI Identified Smuggling Trends Based on Its Seizures in the U.S. but Has Not Analyzed Additional Data to Better Understand Firearms Smuggling Schemes

ICE HSI has analyzed DHS data on firearms intended for Mexico and seized in the United States, but it has not analyzed other types of data—including ATF data on U.S. firearms recovered in Mexico—that could help it better understand trends in firearms smuggling to Mexico. In 2017, HSI analyzed DHS data on seizures of 1,012 firearms during 360 seizure events in the United States that occurred in fiscal years 2014 through 2016. Of those seizure events, 184 took place at the U.S.–Mexican border, with 167 involving vehicles, 15 involving pedestrians, and two involving commercial air; the remaining 176 seizure events did not take place at the border and were based on investigative leads. HSI reported the following findings, among others, based on its 2017 analysis of DHS seizures:

- Rifles were the main type of firearm seized, with the average seizure leading to the recovery of three to four rifles.
- Most attempts to smuggle munitions (i.e., firearms and ammunition) to Mexico involved land border crossings.

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<sup>21</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

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- Concealment in vehicles was the method most commonly used to hide munitions.

However, according to HSI officials, although DHS has received some ATF trace data, such as data on firearms connected to HSI investigations, HSI has not analyzed these data to identify firearms smuggling trends. In 2017, HSI analyzed only firearms intended for Mexico but seized in the United States by DHS. According to HSI officials, when HSI identifies a firearm recovered in Mexico during an investigation and requests related trace data from ATF, ATF shares the tracing information about that firearm. But HSI has not analyzed such information to identify trends related to the successful smuggling of firearms to Mexico; according to HSI officials, they were more focused on analyzing information for specific investigations. HSI officials said that information about firearms recovered in Mexico that were likely successfully smuggled from the United States was an area that needed additional analysis. According to the 2019 *National Intelligence Strategy*, strategic intelligence requires developing and maintaining a deep understanding of the strategic environment, including transnational organized crime, to support U.S. national security policy and planning decisions.

Moreover, because ATF has shared only data connected to HSI investigations, HSI has not analyzed ATF data on the approximately 56,000 U.S.-sourced firearms that were reported recovered in Mexico in 2014 through 2018 and were likely smuggled into Mexico.<sup>22</sup> Although U.S. law allows ATF to share trace data with ICE and other law enforcement agencies, ATF officials said they consider the names of the initial purchaser and the federal firearms licensee that sold a recovered firearm to be sensitive information.<sup>23</sup> ATF procedures state that, to prevent the

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<sup>22</sup>Trace data include information about the firearm submitted for tracing and information that ATF identified through its tracing, including the names of federal firearms licensees who sold the firearm and, potentially, the initial and subsequent purchasers.

<sup>23</sup>ATF officials noted that a provision of law, commonly referred to as the Tiahrt Amendment, that generally prohibits obligations of funds to disclose, among other things, eTrace data includes an exception for disclosure to federal, state, or tribal law enforcement officials, except where such disclosure would compromise the identity of any undercover law enforcement officer or confidential informant or interfere with any case under investigation. The law also states that this proviso shall not be construed to prevent, among other things, the sharing or exchange of statistical information concerning total production, importation, and exportation by each licensed importer and licensed manufacturer among and between federal law enforcement. See Pub. L. No. 112-55, 125 Stat. 609-610.

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compromising of a criminal investigation or undercover operation, ATF will not release specific firearms trace results to any third party, including law enforcement, without the permission of the agency that requested the trace.<sup>24</sup> According to ATF policy, ATF may disclose trace data for jurisdiction-based aggregate analysis of trafficking patterns and trends. For example, ATF may provide a city police department with data on firearms traces within the police department's geographic jurisdiction. Further, the February 2020 *Southwest Border Counternarcotics Strategy* directs U.S. agencies to increase information-sharing to maximize efficiencies and increase seizures of illicit weapons and other items.

Access to ATF tracing information about U.S.-sourced firearms recovered in Mexico—excluding information identifying individual purchasers or federal firearms licensees—would help HSI identify trends in the smuggling of firearms to Mexico, which is a crime within ICE's jurisdiction, according to HSI officials. For example, ATF data showing where firearms were recovered in Mexico and the U.S. locations to which they were traced would be useful for analyzing smuggling routes and methods, according to HSI. According to officials from both agencies, ATF and HSI are considering ways of sharing ATF trace data with restrictions. Options under discussion include ICE's temporarily assigning intelligence analysts to ATF to allow HSI to analyze the data, ATF's sharing trace information through its regional taskforces that include ICE representatives, and ATF's sharing aggregated trace information directly with HSI. However, as of August 2020, ATF and HSI had not yet agreed on how to share ATF trace data effectively.

Because HSI has not analyzed ATF information about U.S.-sourced firearms recovered in Mexico, HSI's understanding of smuggling trends and the tactics used by criminals to successfully smuggle firearms into Mexico has gaps. For example, HSI's 2017 finding that rifles (i.e., long guns) were the main type of firearm being smuggled across the Mexican border is inconsistent with ATF's finding that handguns accounted for 64 percent of firearms recovered in Mexico and traced to the United States. In addition, HSI analysis found that TCOs in Mexico most commonly use straw purchases from federal firearms licensees to obtain U.S.-sourced weapons, whereas ATF analysis found that they most often use secondary purchases. The 2019 *National Intelligence Strategy* states that strategic intelligence requires developing and maintaining a deep

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<sup>24</sup>Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives, *Firearms Enforcement Program*, Order ATF O 3310.4C. (Mar. 19, 2013).

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understanding of the strategic environment, including transnational organized crime, to support U.S. national security policy and planning decisions. Incorporating information about successfully smuggled firearms into its analysis of smuggling trends would provide HSI with a more comprehensive understanding of how U.S.-sourced firearms are acquired and smuggled into Mexico.

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## U.S. Agencies Have Recently Initiated Efforts to Disrupt Firearms Trafficking to Mexico but Lack Performance Measures to Assess Results

ATF, ICE, CBP, and State have each recently established initiatives specifically intended to address firearms trafficking to Mexico. ATF's Operation Southbound and an ICE-CBP joint operation, both established in 2020, aim to disrupt the flow of firearms to Mexico, and a State-led bilateral working group established in 2019 is intended to coordinate U.S. and Mexican firearms efforts. Other agency efforts have addressed firearms trafficking to Mexico indirectly and as part of the agencies' broader missions. However, the agencies' ability to assess their recent initiatives' progress in disrupting firearms trafficking to Mexico is limited, because they lack fully developed performance measures specific to this goal.

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### In 2020, ATF Established an Operation to Disrupt Firearms Trafficking to Mexico and Conducts an Unknown Number of Related Investigations

DOJ's ATF implemented Operation Southbound in April 2020 to disrupt the flow of U.S.-sourced firearms to Mexico. In addition, ATF has conducted numerous firearms investigations, including some related to firearms trafficking to Mexico, although it is unable to identify the number and percentage of investigations with this nexus.

#### Operation Southbound

The strategy for ATF's Operation Southbound states that it was developed in response to the growing threat posed by TCOs and the administration's emphasis on combating Mexican TCOs. According to the strategy, Operation Southbound will use ATF's criminal enforcement, industry operations, and intelligence personnel, in coordination with ICE, CBP, other federal agencies, and state and local law enforcement, to disrupt TCOs' ability to obtain weapons. The operation includes the following components:

1. **Coordination between ATF, ICE, CBP, and other law enforcement agencies to analyze information and develop intelligence on firearms trafficking.** Operation Southbound's primary method for coordinating with firearms trafficking stakeholders is through meetings and intelligence sharing. According to the strategy, ATF will meet on a quarterly basis with ICE, CBP, and other law enforcement entities to review open investigations, analyze firearms information, and share

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intelligence on firearms traffickers and their networks. ATF officials were unable to specify when these coordination meetings between ATF and law enforcement stakeholders would begin.

2. **Creation of multi-agency firearms trafficking taskforces in seven cities that ATF identified as source areas for firearms recovered in Mexico.** Operation Southbound’s strategy identifies, on the basis of tracing data, cities in Texas and Arizona as the primary sources of U.S. firearms recovered in Mexico and submitted for tracing. According to the strategy, the task forces’ responsibilities will include interdicting large-caliber firearms, ammunition, and firearm components and investigating and prosecuting persons involved in trafficking firearms to the southwest border.<sup>25</sup>

## Other Firearms Investigations

### Example of ATF Investigation Related to Mexico

In January 2020, an ATF investigation resulted in the apprehension of a U.S. citizen living in Tijuana who was suspected of trading drugs for firearms. This individual allegedly provided heroin and fentanyl in exchange for three Bushmaster 5.56 mm machine guns (pictured below), three 40mm grenade launchers, and 72 inert grenades. The U.S. Attorney’s Office for the Central District of California is prosecuting the case.



Source: GAO. | GAO-21-322

**ATF domestic investigations.** While some of ATF’s firearms investigations have related to Mexico, ATF cannot determine the number and percentage of such investigations, according to ATF officials. ATF reporting shows that in fiscal year 2018, it initiated 35,839 firearms investigations in the United States and recommended 10,691 cases for prosecution; 7,630 cases led to indictments. ATF officials stated that their criminal investigations typically focus on U.S. firearms violations, such as straw purchasing or illegal possession of a firearm, but not on a suspect’s intent to smuggle a firearm from the United States to Mexico. The officials described examples of firearms investigations connected to Mexico (see sidebar); however, ATF’s case management system is unable to identify the number of investigations that have an international nexus. According to ATF officials, agents conducting a firearms investigation may include information about the firearm’s destination country in case narratives; however, because suspects may not admit intent to traffic firearms to Mexico, such information is often difficult to obtain.

**ATF in Mexico.** In Mexico, the ATF Attaché told us that ATF officials work with Mexican government officials to develop potential investigative leads on U.S.-sourced firearms and submit recovered firearms for ATF tracing. In fiscal year 2019, ATF Mexico City submitted 106 referrals to ATF domestic field offices—that is, information about firearms recovered in Mexico that could be of interest to ATF offices in the United States—resulting in at least 18 new cases and eight arrests or prosecutions,

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<sup>25</sup>Firearms components include cases, ammunition magazines, firearms receivers, firearm scopes, and firearms silencers.

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according to ATF.<sup>26</sup> ATF officials told us that ATF domestic offices may have opened other cases based on referrals from Mexico but that domestic offices did not consistently record those cases as referrals. In addition, ATF Mexico City provided assistance in 388 domestic ATF investigations.

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### ICE and CBP Established Operations Focused on Firearms Smuggling to Mexico in 2020 and Have Seized Some Weapons at the Southwest Border

ICE and CBP initiated a joint operation in fiscal year 2020 to focus on disrupting the smuggling of firearms to Mexico. In addition, ICE HSI recently initiated Operation Strawman to investigate criminal activity related to firearms smuggling to Mexico, and CBP began coordinating outbound inspections with the Mexican government at selected land ports of entry. Before fiscal year 2020, HSI led BEST units along the southwest border to investigate criminal activity, including firearms smuggling, with a nexus to U.S. borders. Similarly, CBP conducted outbound inspections to intercept firearms, drugs, or money being illegally smuggled to Mexico.

### Efforts Focused on Disrupting Firearms Smuggling

**ICE–CBP joint operation.** In fiscal year 2020, ICE and CBP began jointly developing an operation with ATF and other federal, state, and Mexican stakeholders to disrupt the illicit flow of firearms, firearms components, and ammunition from the United States to Mexico. According to a December 2019 document outlining the joint operation’s concept of operations, participating agencies plan to use data from the operation to identify, target, disrupt, and dismantle TCOs responsible for exporting firearms and related munitions from the United States to Mexico. In June 2020, CBP’s Office of Intelligence issued an information bulletin outlining additional questions that CBP agents should ask individuals they detain for trafficking firearms. As of August 2020, CBP and ICE were collecting information but had not initiated the operation’s action phase or identified any results, according to ICE HSI officials.

**Operation Strawman.** In 2019, HSI’s office in Mexico City, in coordination with ATF and the government of Mexico, initiated Operation Strawman to dismantle the smuggling of weapons to Mexico by TCOs, according to an ICE HSI official. An ICE HSI document states that the operation’s purpose is to (1) identify and trace firearms recovered at Mexican crime scenes and (2) analyze trace information for potential investigative leads on U.S.-based firearms purchasers and Mexico-based firearms receivers. According to a February 2020 executive summary of Operation Strawman, ICE HSI had identified 271 weapons leads and 69

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<sup>26</sup>Before fiscal year 2019, ATF’s office in Mexico did not track its investigative referrals and related results. ATF started tracking these results in response to a recommendation we made in 2016 (see [GAO-16-235](#)).

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collateral requests for referral to domestic ICE HSI offices for investigative assistance.

**Coordinated outbound inspections.** In fiscal year 2020, CBP began coordinating with the Mexican government to inspect all outbound traffic into Mexico at selected land ports of entry, resulting in increased firearm seizures, according to CBP officials.<sup>27</sup> CBP officials told us that in October 2019, the Mexican government requested that CBP increase outbound inspections at certain mutually agreed land ports of entry along the southwest border and coordinate these inspections with Mexican government agencies. CBP data show in the first 10 months of fiscal year 2020, CBP seized a total of 321 firearms; 3,053 firearm parts and accessories; and 167,915 rounds of ammunition at the border from outbound inspection efforts. In contrast, in fiscal years 2014 through 2019, CBP seized an average of 115 firearms each year.<sup>28</sup> Despite the increased seizures, CBP and U.S. embassy officials stated that the effectiveness of outbound inspections is diminished by spotters on the Mexican side of the border who warn traffickers approaching it from the U.S. side.

## Other Efforts to Disrupt Firearms Smuggling

**BEST.** HSI BEST units are multiagency task forces comprising federal, state, and local law enforcement agencies that investigate criminal activity, including firearms smuggling, with a nexus to U.S. borders. BEST units seized 2,512 firearms nationwide in fiscal years 2015 through 2017, including 1,104 firearms seized on the U.S. side of the southwest border.<sup>29</sup> ICE HSI reporting does not distinguish firearms that were destined for Mexico. Seizures by BEST units along the U.S.–Mexican border accounted for 44 percent of firearms and 82 percent of ammunition seized by BEST units nationally in fiscal years 2015 through 2017. Data from BEST reports for those fiscal years—the most recent data available from HSI—show that firearms seizures on the U.S.–

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<sup>27</sup>According to CBP officials, prior outbound inspection efforts were not always coordinated with the government of Mexico.

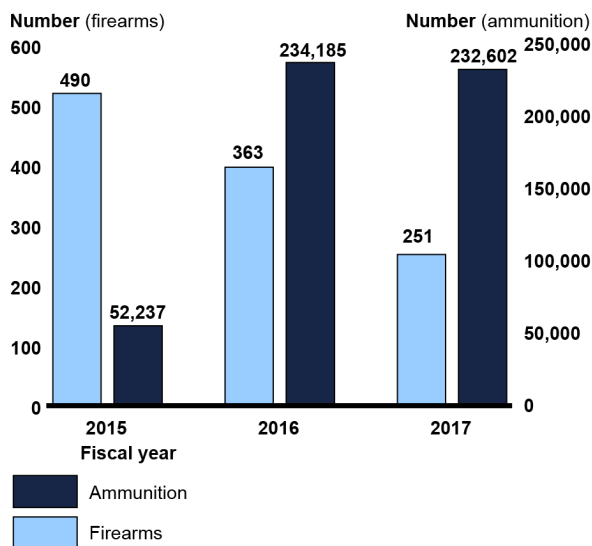
<sup>28</sup>CBP also seized 470,737 rounds of ammunition during this period.

<sup>29</sup>HSI collected data on BEST seizures for DHS's annual BEST reports to Congress. Fiscal year 2017 data are the most recent data included in DHS's March 2019 annual report. DHS was required to report annually on the effectiveness of BEST in enhancing border security and reducing arms smuggling, among other things, beginning in 2013 and for the following 5 years. 6 U.S.C. § 240(e). The reporting requirement ended in fiscal year 2019, and DHS does not plan to issue additional annual reports, according to DHS officials.



Mexican border declined, while ammunition seizures increased (see fig. 9).

**Figure 9: Border Enforcement Security Taskforce (BEST) Firearm and Ammunition Seizures along the U.S.–Mexican Border, Fiscal Years 2015–2017**



Source: GAO analysis of U.S. Immigration and Customs Enforcement’s BEST reports. | GAO-21-322

Note: Data for fiscal year 2017 are the most recent included in DHS’s March 2019 annual report on BEST to Congress. DHS was required to report annually on the effectiveness of BEST, beginning in 2013 and for the following 5 years. 6 U.S.C. § 240(e). The reporting requirement ended in fiscal year 2019, and DHS does not plan to issue additional annual reports.

**CBP interdiction efforts.** CBP’s other outbound interdiction efforts include targeted inspections at ports of entry and operations along the U.S.–Mexican border, some of which are coordinated with Mexican counterparts. According to CBP officials, targeted inspections that, for example, single out particular vehicles for examination on the basis of intelligence leads are more effective than the coordinated outbound inspections that CBP recently initiated. The officials said that targeted inspections have a higher probability of successfully intercepting firearms or other contraband and have a minimal effect on legal border traffic. CBP officials told us that the Office of Field Operations conducts approximately 60 to 70 targeted inspections every day. However, they were unable to provide the number of inspections linked to firearms smuggling to Mexico, because CBP has not systematically tracked the results of its targeted

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inspections.<sup>30</sup> CBP officials stated that targeted operations allow the Office of Field Operations to better leverage resources to identify, on the basis of credible evidence, specific smugglers and vehicles suspected of transporting illicit firearms.<sup>31</sup>

In addition, CBP's U.S. Border Patrol monitors the border between ports of entry, including through mirrored patrols and joint operations with its Mexican government counterparts. During mirrored patrols, Mexican and U.S. officials carry out similar patrols along the same or adjacent sections of the border between official ports of entry on a weekly basis, according to CBP officials. Border Patrol officials stated that mirrored patrols do not focus on a particular suspect or vehicle but instead are intended as a show of force to deter potential smugglers. CBP officials estimated that Border Patrol conducts 1,500 to 2,000 mirrored patrols, lasting 1 to 8 hours, along the U.S.–Mexican border each year; however, they said that the mirrored patrols rarely resulted in seizures of firearms or ammunition. According to Border Patrol officials, Border Patrol has periodically planned joint operations with Mexico that targeted a specific location of the U.S.–Mexican border or a specific smuggling group after CBP received credible intelligence that a suspect was intending to smuggle weapons, drugs, or money between the United States and Mexico.

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### State Coordinates with the Mexican Government and Funds Activities to Build Mexico's Capacity to Combat Firearms Trafficking

State established a bilateral firearms working group in September 2019 to coordinate with the Mexican government on efforts to disrupt firearms trafficking. State also provides assistance to build Mexico's capacity to conduct investigations and interdictions of firearms trafficking. In fiscal years 2015 through 2019, State provided \$54 million to develop Mexican capacity to address firearms trafficking.

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<sup>30</sup>In June 2020, CBP's Office of Intelligence issued guidance, applicable until December 31, 2020, that specifies the types of information CBP agents should attempt to obtain from suspects stopped for potential firearms trafficking violations if the agents reasonably believe the weapons were destined for Mexico. According to CBP, data collected are documented in the seizure narrative of CBP's Seized Assets and Case Tracking System.

<sup>31</sup>CBP's Office of Intelligence and CBP's National Targeting Center provide intelligence about weapons potentially being smuggled out of the United States. These offices have traditionally prioritized analysis of weapons, drugs, and money potentially entering, not exiting, the country, according to CBP officials. Beginning in late 2018, the National Targeting Center increased its efforts to identify intelligence on potential firearms smuggling, according to CBP officials. CBP officials stated that they also receive potential leads for targeted operations from ATF, the Federal Bureau of Investigation, HSI, the Drug Enforcement Administration, and the Mexican government.

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## Bilateral Firearms Working Group

In September 2019, State and Mexican government officials established a firearms-trafficking working group to coordinate U.S. efforts to assist Mexico in investigating and interdicting firearms trafficking and to share with Mexico the results of related U.S. efforts. According to an embassy action plan, the U.S. areas of focus are technical capabilities, intelligence and information sharing, coordination operations, the provision of equipment and training, and a comprehensive strategy to combat firearms trafficking. U.S. and Mexican officials involved in the working group told us that it was an effective coordination mechanism and that both governments were seeking to identify solutions.<sup>32</sup> The U.S. Embassy in Mexico City, represented by the ATF Attaché, and the Mexican government, represented by a Mexican official, cochair the working group. Officials from ATF, ICE, CBP, State, and the Mexican federal government participate in the group.

## Capacity-Building Assistance

State has provided assistance to help Mexico build several aspects of its capacity to combat firearms trafficking. In fiscal years 2015 through 2019, State INL provided \$53 million for 36 projects to build Mexico's capacity to (1) investigate how TCOs acquire firearms and (2) interdict firearms as they cross the border from the United States, according to an INL document.<sup>33</sup> According to State documents, INL-funded activities trained about 2,000 Mexican personnel in firearms identification and assisted at least 15 forensic laboratories in gaining accreditation in firearms-related disciplines, among other things. State documents also show that from 2015 through 2019, Mexican agencies used INL-funded canines to seize nearly 16,000 firearms and used INL-funded inspection equipment to seize about 4,300 firearms. Moreover, in fiscal years 2017 and 2019, State's Bureau of Political–Military Affairs provided \$775,000 for weapons destruction. According to a State document, the Mexican army destroyed at least 340 firearms and 9,000 rounds of ammunition using equipment purchased with State funding. Table 1 shows the types of assistance and associated funding that State provided to build the Mexican government's capacity to combat firearms trafficking.

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<sup>32</sup>U.S. Embassy officials also told us that the new working group functions more effectively than a similar working group that operated under the previous Mexican administration.

<sup>33</sup>State provided a list of 38 INL-identified projects related to firearms trafficking, from which we removed two duplicate entries.

**Table 1: State Assistance Provided to Build Mexican Government Capacity to Combat Firearms Trafficking, Fiscal Years 2015–2019**

Type of assistance	Fiscal years of implementation	Funding in dollars
Law enforcement <sup>a</sup>	2015–2019	53,100,000
Criminal investigations	2015–2019	14,600,000
Border security	2015–2019	38,500,000
Weapons destruction <sup>b</sup>	2017–2019	775,000
<b>Total</b>		<b>53,875,000</b>

Source: GAO analysis of Department of State (State) data. | GAO-21-322

<sup>a</sup>The Bureau of International Narcotics and Law Enforcement Affairs provided assistance to build law enforcement capacity.

<sup>b</sup>The Bureau of Political–Military Affairs provided assistance to build weapons destruction capacity.

Figure 10 shows examples of State’s capacity-building assistance.

**Figure 10: Examples of State Assistance Provided to Build Mexican Government Capacity to Combat Firearms Trafficking**



Left: Canine trained for weapons detection. Center: Ballistics analysis equipment. Right: Vehicle and cargo inspection system.

Source: GAO and State Department. | GAO-21-322

INL provided \$14.6 million to fund 22 projects focused on criminal investigations during fiscal years 2015 through 2019.<sup>34</sup> According to State documents, one of these projects, implemented by DOJ’s International Criminal Investigative Training Assistance Program, is helping Mexican federal and state forensic laboratories achieve accreditation in crime scene investigations, ballistics, fingerprint analysis, questioned-document examination, chemistry, genetics, and forensic medicine analysis.<sup>35</sup>

<sup>34</sup>The list of INL-identified projects related to firearms trafficking that State provided includes 20 projects categorized as “Counternarcotics” and two projects categorized as “Criminal Justice & Rule of Law.”

<sup>35</sup>Questioned-document examination is a forensic science discipline in which expert examiners evaluate documents of questionable authenticity to reveal how they were prepared or may have been modified.

According to a June 2019 progress report, the program provided ballistics assistance and training to 19 Mexican forensic labs. Further, according to the American National Standards Institute, forensic labs in 13 Mexican states and Mexico City have received firearms accreditation in ballistics (see fig. 11). Mexican officials told us that the ballistics training has helped them identify weapons used at multiple crime scenes.<sup>36</sup>

**Figure 11: Mexican Laboratories with Ballistics Accreditation as of July 2020**



Source: Source: GAO analysis of State Department data. | GAO-21-322

INL provided about \$200,000 in funding for ATF-implemented training in serial number restoration and firearm identification to improve Mexican authorities' ability to investigate firearms-related crimes. According to ATF documents, in 2018 and 2019, 47 Mexican personnel from federal and state forensic laboratories participated in serial number restoration

<sup>36</sup>According to DOJ officials, the training's relevance to firearms trafficking is limited by the fact that Mexican state governments do not share their ballistics databases with the Mexican federal government. According to these officials, the Mexican state governments use ballistics information to investigate local crimes, such as homicide and robbery, but not organized crime or weapons trafficking.

training and about 2,000 Mexican federal and state personnel participated in firearm identification training (see fig. 12). Mexican officials told us that the training in serial number restoration was one of the most useful trainings they had received from ATF and that it had helped improve the quality of their investigations.

**Figure 12: Locations of Mexican Federal and State Participants in U.S.-Provided Firearms Identification Training as of July 2020**



Source: GAO analysis of Bureau of Alcohol, Tobacco, Firearms and Explosives data. | GAO-21-322

INL has also provided \$37.3 million to fund 13 projects focused on border security, including projects supplying nonintrusive x-ray inspections equipment.<sup>37</sup> State provided this assistance to Mexican customs and law enforcement agencies and the Mexican military. For example, in fiscal year 2018, INL provided \$1.3 million for the installation of two vehicle and

<sup>37</sup>This information is based on a list of INL-identified projects related to firearms trafficking that State provided. The list includes 13 projects that INL categorized as "Border and Port Security" and one project that INL categorized as "Police Professionalization," which CBP implemented to provide cross-border coordination.

cargo inspection systems that it had donated previously to the Mexican customs agency.

In fiscal years 2017 through 2019, the Bureau of Political–Military Affairs’ Weapons Removal and Abatement program provided \$775,000 to reduce the ability of criminals in Mexico to obtain illicit small arms, light weapons, and ammunition from interdicted firearms held in government stockpiles. In June 2019, the program provided Mexican military bases in Monterrey, Reynosa, Saltillo, and Tijuana with weapons destruction equipment—six hydraulic shears and three ammunition burn tanks—and trained Mexican army personnel in its use. According to a State document, the Mexican army subsequently used this equipment to destroy more than 340 firearms and 9,000 rounds of ammunition.

**U.S. Agencies Lack Performance Measures to Assess Results of Their Initiatives to Disrupt Firearms Trafficking to Mexico**

Although U.S. agencies have identified goals for their recent initiatives focused on disrupting the trafficking of U.S.-sourced firearms to Mexico, they have not fully developed the performance measures needed to assess progress toward this goal (see table 2). According to Office of Management and Budget guidance, performance measures should include goals, indicators, and targets.<sup>38</sup> In addition, we previously reported that well-defined performance indicators link to an agency’s strategic objectives and its planned actions and have baselines and targets for achieving discrete tasks within a specific time.<sup>39</sup>

**Table 2: Extent to Which U.S. Agencies Have Developed Performance Measures for Recent Initiatives Focused on Disrupting U.S.-Sourced Firearms Trafficking to Mexico**

Lead agency	Initiative	Fiscal year when established	Performance measure elements			
			Goals	Indicators	Targets with baselines	Time frames
ATF	Operation Southbound	2020	✓	✗	✗	✗
ICE and CBP	Joint operation	2020	✓	✗	✗	✗
State	Bilateral firearms trafficking working group and related capacity-building assistance	2019	✓	✓	✗	✗

<sup>38</sup>According to the Office of Management and Budget guidance, a performance indicator is a measurable value used to track progress toward a goal or target within a time frame. A target is a quantifiable or otherwise measureable characteristic and should include a baseline or other trend data to indicate how well or at what level the agency aspires to perform. See Office of Management and Budget, *Preparation, Submission, and Execution of the Budget*, Circular No. A-11 (Washington, D.C.: July 2020).

<sup>39</sup>See [GAO-20-595](#).

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Legend: ATF = Bureau of Alcohol, Tobacco, Firearms and Explosives; CBP = U.S. Customs and Border Protection; ICE = U.S. Immigration and Customs Enforcement; State = Department of State; ✓ = evidence of performance measure element; ✗ = no evidence of performance measure element.

Source: GAO analysis of U.S. agency documentation. | GAO-21-322

Our review of documentation for ATF's, ICE's, CBP's, and State's recent initiatives found the following, as shown in table 2:

- **ATF.** Documentation for ATF's Operation Southbound identifies general operational goals and objectives as well as roles and responsibilities for participating agencies. For example, a stated objective of Operation Southbound is coordination among federal agencies, state and local law enforcement, and prosecutors through various means to improve the collection, analysis, and flow of information and to enhance the development of intelligence regarding traffickers and their networks. However, the documentation does not identify performance indicators, targets, baselines, or time frames for assessing the operation's results.
- **ICE and CBP.** Documentation for ICE and CBP's joint operation outlines objectives and participating agencies' roles and responsibilities. For example, one of the joint operation's stated objectives is to increase the interdiction and seizure of undeclared ammunition, currency, and weapons being smuggled into Mexico from the United States. However, the documentation does not include performance indicators, targets, baselines, or time frames that would allow HSI and CBP to measure progress in disrupting the illicit flow of firearms, firearms components, and ammunition to Mexico.<sup>40</sup> After we raised this concern in August 2020, HSI officials told us in October 2020 that they had begun considering potential performance measures.
- **State.** In February 2020, State officials in Mexico told us that countering firearms trafficking is a priority for the U.S. Embassy and that State would be updating its integrated country strategy to incorporate this priority.<sup>41</sup> State's arms trafficking working group's action plan includes the five U.S. strategic areas of focus with

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<sup>40</sup>According to CBP officials, CBP measures and reports outbound weapons seizures on the basis of cumulative seizures, but this performance measure is not specific to seizures of weapons bound for Mexico. For fiscal year 2020, CBP's seizure target was 500 weapons nationwide.

<sup>41</sup>In August 2020, State officials told us they had not yet updated the integrated country strategy for Mexico.



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Mexico—technical capabilities, intelligence and information sharing, coordination operations, provision of equipment and training, and a comprehensive strategy to combat firearms trafficking. In addition, INL's *Mexico Country Strategy, 2020–2024* states that a primary objective is partnering with Mexico to sustainably disrupt the business model of TCOs. However, the working group's action plan does not identify performance measures for any of the strategic areas of focus to allow State to assess progress in building Mexico's capacity. Moreover, although the INL strategy identifies the seizure of firearms as an indicator, it does not identify targets, baselines, or time frames that would allow the agency to measure the results of its efforts.

Because ATF, ICE, CBP, and State have not developed all of the required elements of performance measures for their recent initiatives to disrupt firearms trafficking to Mexico, they are unable to assess the initiatives' progress in achieving this goal. Since the clandestine nature of firearms trafficking makes it difficult for the agencies to measure such results, logic models or similar tools could be useful to identify a range of relevant indicators and targets (see app. II for an example of a logic model).<sup>42</sup> Identifying relevant performance measures would strengthen the agencies' ability to focus their resources effectively to disrupt the trafficking of U.S.-sourced firearms to Mexico.

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## Conclusions

The illegal flow of firearms from the United States to TCOs in Mexico contributes to suffering on both sides of the border and is a longstanding concern. Because of the violence and death associated with these organizations' illicit drug activities, the U.S. government has identified TCOs in Mexico as a threat to U.S. national security. In February 2020, the U.S. government issued national guidance emphasizing the importance of disrupting the flow of firearms to these organizations. Yet an estimated 200,000 U.S.-sourced firearms continue to be trafficked into Mexico each year, despite U.S. agencies' efforts to address this problem.

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<sup>42</sup>By specifying a program's theory of what is expected at each step, a logic model can help an agency define measures of the program's progress toward its ultimate goals. For example, performance measures may include short-term outcomes such as development of knowledge, attitudes, and skills; intermediate outcomes such as actions needed to achieve program goals; and long-term outcomes such as a program's ultimate impact. Because the actual number of firearms trafficked each year remains unknown, making long-term impacts difficult to assess, short-term and intermediate outcomes could be especially useful as performance measures for U.S. agencies' efforts to combat firearms trafficking to Mexico.

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Although U.S. agencies have analyzed data on U.S.-sourced firearms recovered in or en route to Mexico, the agencies can increase their understanding of how TCOs obtain these weapons. Establishing time frames for its planned outreach to, and training for, Mexican agencies to improve its access to information about recovered firearms would help ATF ensure timely implementation of these activities. In addition, further analysis of information about U.S.-sourced firearms connected to Mexico—such as firearms seized in the United States in transit to Mexico—would enable ATF to better understand how TCOs are acquiring them. Moreover, receiving ATF information about U.S.-sourced firearms recovered in Mexico, and analyzing this information, would enhance ICE HSI’s understanding of firearms smuggling from the United States.

Recently, U.S. agencies have recognized disrupting firearms trafficking to Mexico as a U.S. priority and established new plans and initiatives, such as ATF’s Operation Southbound and ICE and CBP’s joint operation, to combat it. However, the agencies have not identified all of the elements of performance measures needed to assess progress toward this goal. Identifying relevant indicators and targets for their efforts to disrupt the trafficking of U.S.-sourced firearms to Mexico would enhance ATF’s, ICE’s, CBP’s, and State’s ability to focus their resources effectively to address this threat to U.S. national security.

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## Recommendations for Executive Action

We are making a total of eight recommendations, including four to ATF, two to ICE, one to CBP, and one to State. Specifically:

The Director of ATF, working with State, should establish time frames for outreach to, and training for, Mexican agencies to encourage and facilitate additional submissions of information about recovered firearms to ATF for tracing. (Recommendation 1)

The Director of ATF should analyze additional information—for example, data about U.S.-sourced firearms intended for Mexico but seized in the United States—to supplement its existing analysis identifying trends related to the illegal diversion of firearms and the trafficking of these firearms to Mexico. (Recommendation 2)

The Director of ATF, working with ICE, should identify a mechanism for sharing aggregated information with HSI about firearms recovered in Mexico and traced to the United States. (Recommendation 3)

The Director of ICE should ensure that HSI analyzes additional information—for example, data that ATF shares about U.S.-sourced

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firearms recovered in Mexico—to supplement its existing analysis identifying smuggling trends and patterns. (Recommendation 4)

The Director of ATF, in consultation with relevant agencies, should develop performance measures to assess the results of ATF's efforts to investigate the trafficking of U.S.-sourced firearms to Mexico. (Recommendation 5)

The Director of ICE should ensure that HSI, in consultation with relevant agencies, develops performance measures to assess the results of its efforts to investigate firearms smuggling into Mexico. (Recommendation 6)

The Commissioner of CBP, in consultation with relevant agencies, should develop performance measures to assess the results of CBP's efforts to interdict firearms being smuggled into Mexico. (Recommendation 7)

The Secretary of State, in consultation with relevant agencies, should develop performance measures to assess the results of State's assistance to Mexico related to firearms trafficking. (Recommendation 8)

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## Agency Comments

We provided drafts of the sensitive version and public version of this report to DHS, DOJ, and State for review. DHS's comments about the public version and State's comments about the sensitive version are reproduced in appendixes III and IV, respectively. DHS and DOJ also provided technical comments, which we incorporated as appropriate.

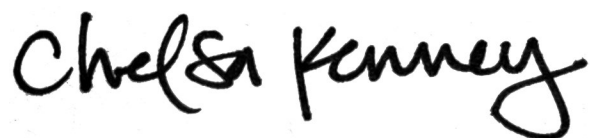
DHS concurred with our recommendations and noted that ICE and CBP were considering steps to improve their analysis and measure their efforts related to firearms trafficking to Mexico. In an email from its Audit Liaison Group, DOJ also concurred with our recommendations. State concurred with our recommendations and noted that it was working to develop performance measures to assess its assistance to Mexico related to firearms trafficking.

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As agreed with your offices, 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 Acting Attorney General of the United States, the Secretary of Homeland Security, and the Secretary of State. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

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If you or your staff have any questions about this report, please contact me at (202) 512-2964 or [KenneyC@gao.gov](mailto:KenneyC@gao.gov). Contact points for our Office of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who contributed to this report are listed in appendix V.

A handwritten signature in black ink that reads "Chelsea Kenney". The signature is written in a cursive, flowing style.

Chelsea Kenney  
Director, International Affairs and Trade

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# Appendix I: Objectives, Scope, and Methodology

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This report examines (1) the extent of U.S. agencies' knowledge about firearms trafficking to Mexico and (2) U.S. agencies' efforts to disrupt firearms trafficking to Mexico and the extent to which they have assessed those efforts.

To address these objectives, we analyzed data and reviewed documents provided by the Departments of Homeland Security (DHS), Justice (DOJ), and State (State). We interviewed officials from DHS's U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), and Office of Intelligence and Analysis to obtain information about efforts to counter firearms trafficking to Mexico, data on DHS firearm seizures along the U.S.–Mexican border, and supporting documentation of DHS efforts. We interviewed officials from DOJ's Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) to obtain information about their analysis of data, firearms-trafficking investigations and about U.S. efforts to provide capacity-building assistance and training to Mexican law enforcement to improve Mexico's ability to identify and interdict firearms.

We interviewed officials from State's Bureaus of International Narcotics and Law Enforcement Affairs, Political-Military Affairs, and Western Hemisphere Affairs to obtain information about U.S. diplomatic efforts to counter firearms trafficking and U.S. capacity-building assistance provided to Mexico. In addition, we interviewed U.S. and Mexican government officials in Mexico and conducted site visits to Mexican forensic laboratories in Guadalajara and Puebla. The information about foreign law in this report is not the result of our original analysis but is the product of interviews and secondary sources.

To determine the extent of U.S. agencies' knowledge about firearms trafficking to Mexico, we asked ATF and ICE to provide any analytical reports about firearms trafficking and firearms smuggling that they had published from 2014 through 2020. ATF provided two reports, published in 2018 and 2020, identifying trends in firearms trafficking to Mexico. ICE provided one report, published in 2017, identifying trends in firearms smuggling to Mexico. In addition, as part of our evaluation of U.S. agencies' knowledge about firearms trafficking to Mexico, we reviewed U.S. agencies' sources for their analyses to determine whether they had identified and obtained relevant data from reliable internal and external sources.

To learn about the types of firearms being trafficked to Mexico and their origins, we obtained from ATF's Violent Crime Analysis Branch a compilation of the results of tracing requests for firearms recovered in

Mexico for 2014 through 2018. These results included information about each firearm's type, its manufacturing origin, the U.S. state where it was first purchased, and its seizure date, among other data points.

To assess the reliability of the tracing data, we interviewed officials at the National Tracing Center who were responsible for overseeing its tracing database and for executing the firearms tracing process. We discussed the methodology for submitting a trace request and the processes for maintaining tracing data and checking the data for missing information, outliers, and obvious errors, among other actions. On the basis of the information these ATF officials provided, we determined that the tracing data were sufficiently reliable for reporting summary statistics on the types of firearms submitted to ATF for tracing after being recovered in Mexico. We also determined that the data were sufficiently reliable for analyzing ATF's determinations about the locations where those firearms were manufactured and initially purchased. As we reported, ATF tracing data are not representative of all firearms recovered in Mexico or of those connected with crime, in part because not all firearms recovered in Mexico are submitted to ATF for tracing and because some trace requests are missing certain information, such as serial numbers. We validated the tracing data in discussions with U.S. officials in Mexico and Mexican diplomatic, security, law enforcement, and customs officials.

To examine the efforts undertaken by U.S. agencies to counter firearms trafficking to Mexico and the extent to which the agencies have assessed the results of these efforts, we reviewed U.S. agency documents and interviewed officials at DHS, DOJ, and State. Additionally, we met with officials from Mexico's federal Attorney General's Office (Fiscalía General de la República), state Attorney Generals' Offices (Fiscalía General del Estado), Secretariat of Foreign Affairs (Secretaría de Relaciones Exteriores), Secretariat of Security and Citizen Protection (Secretaría de Seguridad y Protección Ciudadana), and Tax Administration Service (Servicio de Administración Tributaria). We reviewed plans and reports issued by DHS, DOJ, and State to identify activities and programs relevant to disrupting firearms trafficking to Mexico and to identify performance measures, if any, that the agencies could use to assess the results of their efforts. Specifically, we reviewed DHS congressional reporting on firearms-related efforts along the U.S.–Mexican border for fiscal years 2014 through 2019. We reviewed ATF monitoring reports on firearms-related training and outreach provided to Mexican law enforcement entities to identify the types of training provided; the numbers of Mexican officials who participated; and the results, if any, of the ATF training. We analyzed funding data from State's Bureau of

International Narcotics and Law Enforcement Affairs and Bureau of Political-Military Affairs for firearms-related efforts in Mexico to identify the types of capacity-building assistance that State provided to improve Mexico's ability to counter firearms trafficking. We validated these data in discussions with U.S. and Mexican law enforcement officials.

We determined that the control activities component of internal control was significant to this objective, along with the underlying principles that management should design control activities to achieve objectives and respond to risks. In addition, we identified Office of Management and Budget guidance related to identifying performance measures.<sup>1</sup> We reviewed U.S. agencies' strategies and planning documents focused on disrupting firearms trafficking to Mexico to determine whether U.S. agencies had designed control activities to achieve their objectives, including identifying performance measures.

The performance audit on which this report is based was conducted from September 2019 to December 2020 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. We subsequently worked with DOJ and DHS from December 2020 to February 2021 to prepare this version of the original sensitive report for public release. This public version was also prepared in accordance with generally accepted government auditing standards.

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<sup>1</sup>See Office of Management and Budget, *Preparation, Submission, and Execution of the Budget*, Circular No. A-11 (Washington, D.C.: December 2019).

# Appendix II: Logic Models

Assessment tools such as logic models can be used to develop a range of performance measures. Logic models can describe a program’s components and desired results while explaining the strategy by which the program is expected to achieve its goals. A logic model represents the relationship between a program’s various components, typically including, at a minimum, inputs, activities, outputs, and outcomes. By specifying the program’s theory of what is expected at each step, a logic model can help an agency define measures of the program’s progress toward its ultimate goals. Table 3 shows an example of a logic model used by the Department of State.

**Table 3: Summary of Logic Model Example from Department of State’s Office to Monitor and Combat Trafficking in Persons**

<b>PROJECT GOAL:</b> To develop and strengthen the national criminal justice system’s response to trafficking in persons and ensure access to justice and fair treatment for all victims of trafficking in persons.			
<b>Objective 1:</b> To increase the number of trafficking in persons cases identified, investigated, and prosecuted by criminal justice practitioners in XX country.			
<b>Activity 1:</b> Develop a training manual with tools that address core elements of a victim-centered criminal justice response to combat human trafficking that is structured around national laws and case files.			
<b>Output 1.1</b>	<b>Output indicator 1.1</b>	<b>Outcome 1.1</b>	<b>Outcome indicator 1.1</b>
Tailored training manual with tools developed	Training manual and tools developed (target: manual and tools in two languages)	Training manual and tools appropriately and effectively utilized by government stakeholders	[Number] government institutions/structures that appropriately and effectively utilize manual/tools (target: four ministries, eight state-level police units, 30 district-level court systems)
<b>Activity 2:</b> Conduct multidisciplinary week-long trainings on victim-centered investigations and prosecutions.			
<b>Output 1.2</b>	<b>Output indicator 1.2</b>	<b>Outcome 1.2</b>	<b>Outcome indicator 1.2</b>
Trainings conducted on victim-centered investigations and prosecutions	[Number] week-long trainings (target: 10) [Number] criminal justice practitioners trained (target: 150)	Trained criminal justice practitioners identify, investigate, and prosecute trafficking in persons crimes	1.2.1 [Number] investigations by trained law enforcement officials (target: 50) 1.2.2 [Number] prosecutions by trained prosecutors (target: 40) 1.2.3 [Number] convictions by trained prosecutors (target: 10)

Source: GAO summary of logic model example from Department of State’s Office to Monitor and Combat Trafficking in Persons. | GAO-21-322



# Appendix III: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

February 8, 2021

Chelsa Kenney  
Director, International Affairs and Trade  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Re: Management Response to Draft Report GAO-21-322, "FIREARMS TRAFFICKING: U.S. Efforts to Disrupt Gun Smuggling to Mexico Would Benefit from Additional Data and Analysis"

Dear Ms. Kenney:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

The Department is pleased to note GAO's recognition of the increase in outbound inspections resulting in an increase of firearms seizures as well as the identification of smuggling trends based on the data analyzed from these seizures. During Fiscal Year (FY) 2020, a series of joint initiatives between U.S. Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI), and U.S. Customs and Border Protection (CBP) resulted in: (1) 77 arrests; (2) 489 seized firearms; (3) 379,183 seized rounds of ammunition; (4) \$16,717,363 seized currency; (5) 17 Reports of Analysis; and (6) 24 case correlation identifications. DHS continues to work closely with Department of Justice (DOJ) Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) case agents to discover additional trends and patterns of firearms traffickers and disrupt and dismantle illicit smuggling networks.

In addition, DHS joint efforts between CBP and ICE seek to consolidate investigative data, and to integrate ICE HSI-held data with data housed in proprietary CBP holdings. ICE HSI National Targeting Center – Investigations, and the Innovation Laboratory personnel are currently working to ingest, store, process, and analyze report of

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**Appendix III: Comments from the Department  
of Homeland Security**

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investigation data. Any data overlaps identified from this integration will be used to establish links, identify networks and ultimately produce investigative leads.

Furthermore, DHS and DOJ are collaborating on a joint public information campaign intended to educate the public on the consequences of firearms trafficking, while also eliciting information from the public to combat the illicit flow of firearms, firearms components, and ammunition from the United States into Mexico to reduce gun violence on both sides of the border. A telephone tip line and public service announcements will be created as part of this effort. Additionally, DOJ will place signage in English and Spanish asking for the public's help to stop weapons trafficking via the tip line throughout the communities on both sides of the U.S.-Mexico border, and resulting tips and leads will be routed for appropriate dissemination and action. The Department believes these actions will enhance interdictions and investigations, and will lead to the disruption and dismantlement of criminal networks. DHS remains committed to working with partner agencies to further analyze data and identify smuggling trends related to firearms trafficking.

The draft report contained eight recommendations, including three for DHS with which the Department concurs. Attached find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, sensitivity, and contextual issues with the report under a separate cover for GAO's consideration.

Again, thank you for the opportunity to comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

**JIM H  
CRUMPACKER**

Digitally signed by JIM H  
CRUMPACKER  
Date: 2021.02.08 09:28:35  
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JIM H. CRUMPACKER, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office

Attachment

**Attachment: Management Response to Recommendations  
Contained in GAO-21-322**

GAO recommended that the ICE Director:

**Recommendation 4:** Ensure that HSI analyzes additional information—for example, data that ATF shares about U.S.-sourced firearms recovered in Mexico—to supplement its existing analysis identifying smuggling trends and patterns.

**Response:** Concur. ICE HSI is responsible for export control investigations and is currently analyzing and reporting on firearms smuggling to Mexico. To supplement existing analysis, ICE HSI will secure data sets relevant to investigating firearms trafficking into Mexico from a supply chain perspective. ICE HSI's Innovation Lab develops platforms to better analyze existing data sources and proprietary trace data held by ATF, which are addressed collectively.

Additionally, ICE HSI and ATF are discussing developing a standard operating procedure for sharing data on U.S.-sourced firearms recovered in Mexico. ATF data is critical to the success of this effort, since ICE HSI does not receive (nor has access to) the ATF bulk trace data or non-case-specific data from recent seizures involving weapons destined for (or that have been recovered in) Mexico. This data set is a key component to ICE HSI's ability to develop a complete analysis and trending of U.S.-sourced firearms recovered in Mexico. Upon ICE HSI's access to this ATF data, ICE HSI will ingest this data into its databases for analysis and cross-referencing to discover case correlations and to jointly (with ATF) pursue additional investigative leads. Estimated Completion Date (ECD): November 30, 2021.

**Recommendation 6:** Ensure that HSI, in consultation with relevant agencies, develops performance measures to assess the results of its efforts to investigate firearms smuggling into Mexico.

**Response:** Concur. In FY 2020, ICE HSI and CBP undertook a series of joint initiatives focused on enhancing analytics and intelligence to identify, target, disrupt, and dismantle Transnational Criminal Organizations responsible for exploiting otherwise illicit trade and travel in ongoing conspiracies to unlawfully procure, transport, and ultimately export firearms and related munitions from the United States into Mexico. To demonstrate that these joint activities lead to successful outcomes that will link key firearms trafficking networks and provide evidentiary support for seizures, arrests, and case support, ICE HSI will collect the following statistics each fiscal year to systematically track program results:

- Number of Arrests

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**Appendix III: Comments from the Department  
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- Number of Seizures - Weapons, Money
- Number of Tips
- Number of Leads
- Number of Reports of Analysis (intelligence productions) in support of cases
- Number of Identified Case correlations (overlaps/case links)

ECD: September 30, 2021.

GAO recommended that the CBP Commissioner:

**Recommendation 7:** In consultation with relevant agencies, develop performance measures to assess the results of CBP's efforts to interdict firearms being smuggled into Mexico.

**Response:** Concur. The CBP Office of Field Operations will integrate existing outbound weapons performance requirements to align with CBP's annual performance measures that are in place based on the Government Performance and Results Act Modernization Act of 2010. ECD: September 30, 2021.

# Appendix IV: Comments from the Department of State



United States Department of State  
*Comptroller*  
Washington, DC 20520

NOV 24 2020

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

Dear Mr. Melito:

We appreciate the opportunity to review your draft report, "FIREARMS TRAFFICKING: U.S. Efforts to Disrupt Gun Smuggling into Mexico Would Benefit from Additional Data and Analysis" GAO Job Code 103788.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey C. Mounts".

Jeffrey C. Mounts

Enclosure:  
As stated

cc: GAO – Chelsa Kenney Gurkin  
INL – Kirsten Madison  
OIG - Norman Brown

Department of State Comments on GAO Draft Report

**FIREARMS TRAFFICKING: U.S Efforts to Disrupt Gun Smuggling into  
Mexico Would Benefit from Additional Data and Analysis**  
(GAO-21-134SU, GAO Code 103788)

Thank you for the opportunity to comment on the GAO draft report, *“Firearms Trafficking: U.S Efforts to Disrupt Gun Smuggling into Mexico Would Benefit from Additional Data and Analysis.”*

**Recommendation 8:** The Secretary of State, in consultation with relevant agencies, should develop performance measures to assess the results of State’s assistance to Mexico related to firearms trafficking.

The Department agrees with this recommendation. The Department recognizes that continuous collaboration with other federal agencies is vital for our success to combat crime and violence perpetrated by transnational criminal organizations (TCO) along the United States border with Mexico. To that end, the Department is currently working to develop a course of action to develop performance measures to assess the results of State’s assistance to Mexico related to firearms trafficking.

Thank you for your work in producing this report.

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# Appendix V: GAO Contact and Staff Acknowledgments

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## GAO Contact

Chelsa Kenney, (202) 512-2964 or [KenneyC@gao.gov](mailto:KenneyC@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Celia Thomas (Assistant Director), Brandon L. Hunt (Analyst-in-Charge), Juan Pablo Avila-Tournut, Martin De Alteriis, Koffi Dogbevi, Mark Dowling, Suzanne Kaasa, Christopher Keblitis, and Reid Lowe made key contributions to this report.

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