HOMELAND SECURITY INVESTIGATIONS

STRATEGY FOR COMBATING/ILLICIT OPIOIDS



Homeland Security Investigations

A Letter from the Acting Executive Associate Director of Homeland Security Investigations

The United States is facing an unprecedented epidemic of deaths from illicit synthetic opioids. The drugs fueling these deaths, such as fentanyl, have unfortunately become household names. This crisis has spared no part of the American society. Americans are dying at an unimageable rate, and more needs to be done. After spending more than two decades of my career in the fight against illegal drugs, it is now more evident than ever that HSI needs a bold and innovative strategy to stem the flow of dangerous narcotics. The opioid crisis is a public emergency that demands more action from HSI.

In the past five years, HSI has seized more than 54,000 pounds of fentanyl and interdicted over 2.2 million pounds of synthetic drug precursor chemicals. Notwithstanding these successes, overdose deaths continue to plague our country. We must prevent the illegal importation of these deadly chemicals and the illicit finance, cybercrime, gang activity, and weapons smuggling that enable it.

I am pleased to announce HSI's first-ever *Strategy for Combating Illicit Opioids*. The *Strategy* is based on decades of experience in combating transnational organized crime and is aligned with our unique authorities and counter-network approach. Its objectives are meant for immediate implementation and impact.

Whether you live in a rural area, a large city, or the suburbs, we have all been negatively impacted by the plague of narcotics trafficking in our communities. The American people deserve a collaborative and comprehensive approach to tackle this problem and there is no federal law enforcement agency better positioned to advance the fight than HSI. We are committed now more than ever to standing with our partners and taking every action within our power to end this epidemic. Our children, families, and loved ones depend on it.

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Table of Contents

Overview	4
Primary Objectives	5
Goal 1: Reduce the International Supply of Illicit Opioids	6
Goal 2: Reduce the Domestic Supply of Illicit Opioids	8
Goal 3: Attack the Enablers of Illicit Opioid Trafficking: Illicit Finance, Cybercrime, and Weapons Smuggling	
Goal 4: Conduct Outreach with Private Industry	13
Conclusion	14



Homeland Security Investigations Strategy for Combating Illicit Opioids

Overview



verdose deaths linked to synthetic drug use are impacting the American people on an unprecedented scale. For the first time in our country's history, drug overdoses led to the deaths of over 100,000 Americans in a single year in 2021, equating to over 270 deaths per day. National Safety Council data reinforces the level of the threat posed by accidental opioid overdose, identifying it as the leading cause of death for 18-to-45yearolds.

As the principal investigative arm of the Department of Homeland Security (DHS), HSI plays a pivotal role in disrupting the supply of illicit opioids at every point in the drug supply chain: internationally, where transnational criminal organizations (TCOs) source precursor chemicals and manufacture illegal drugs; at our nation's physical border and ports of entry (POEs), where smuggling cells attempt to exploit America's legitimate trade, travel, and transportation systems; in communities throughout the United States, where criminal organizations earn substantial profits from selling illegal drugs to American citizens; and in cyberspace, where bad actors sell illegal opioids on illicit marketplaces.

HSI's strategy to reduce illicit opioids is built upon its unique Customs authorities, a counter poly-criminal approach to attacking TCOs, and an intelligence-driven focus on investigating supply chains deeply rooted in its U.S. Customs legacy. TCOs involved in illicit opioid trafficking do not limit themselves to narcotics offenses. These criminal groups have expanded beyond narcotics smuggling into the associated crimes of weapons trafficking, human smuggling and trafficking, cybercrime, and money laundering-all of which are within the investigative purview of HSI. To dismantle these organizations, HSI employs a broad investigative strategy, attacking all illicit TCO activity under its statutory authority. This enables methods of combating TCOs unavailable to other federal law enforcement agencies. For example, HSI-the only investigative agency with border search authority—uses its extensive expertise in illicit cross-border trade and unique access to Customs and financial data to target and seize illicit shipments of drug precursor chemicals, preventing the synthesis of drugs like fentanyl and methamphetamine.

This approach is vital to reducing the supply of illicit opioids fueling the overdose epidemic. Currently, most illicit opioids sold in the United States are made with precursor chemicals originating in China that do not enter the United States. Rather, they are transported via a network of land and sea



routes to Mexico and Central America, eventually landing in the hands of Mexican criminal organizations. In many cases, precursor chemicals are shipped through legitimate carriers because they are controlled neither in the origination country nor in the destination country. This complex exploitation of legitimate commerce and shipping networks highlights the importance of leveraging Customs authorities and expertise when investigating the complex international supply chains used by Mexican cartels to synthesize illicit opioids. HSI builds criminal cases against TCOs based on the seizure of precursor chemicals still in the supply chain, preventing the synthesis of illicit opioids while gathering the evidence needed for criminal prosecution.

Primary Objectives

While it builds on the agency's extensive existing efforts, HSI's *Strategy for Combating Illicit Opioids* acknowledges that more must be done. The strategy's elements, which align with the strategic framework set forth by the National Drug Control Strategy, provide the requisite specificity necessary for facilitating implementation. The elements of the strategy fall within four primary objectives:

Goal 1: Reduce the International Supply of Illicit Opioids

Goal 2: Reduce the Domestic Supply of Illicit Opioids

Goal 3: Attack the Enablers of Illicit Opioid Trafficking: Illicit Finance, Cybercrime, and Weapons Smuggling

Goal 4: Conduct Outreach with Private Industry

To achieve these goals, HSI has identified substantive steps based on its decades of experience in combating TCOs that align with its unique authorities and counternetwork approach. HSI recognizes that no single agency can tackle an issue of this magnitude and will execute this strategy in conjunction with its federal, state, local, tribal, and international partners. When fully implemented, these steps will strengthen the United States' response to illicit opioid trafficking and consequently form a foundation for countering the overdose epidemic.

GOALS



Goal 1: Reduce the International Supply of Illicit Opioids



The illicit opioids behind the unprecedented number of overdose deaths experienced in our nation's recent history are primarily produced abroad through supply chains that do not traverse the United States until synthesized opioids are smuggled across the border. HSI takes a forward-leaning approach to identifying and mitigating threats before they reach our nation's soil. To disrupt illicit synthesis, HSI will increase its capacity to conduct supply chain-focused investigations and reinforce the ongoing development of innovative approaches, such as partnering with the Department of Justice (DOJ) Consumer Protection Branch to pursue novel charges against the companies supplying precursor chemicals.

Foreign partner engagement is a particularly crucial element to these investigations. HSI has the authority to build supply chain

investigations but is prohibited from conducting most law enforcement actions in foreign jurisdictions without host country permission. This makes HSI foreign vetted units, known as Transnational Criminal Investigative Units (TCIUs), and other foreign law enforcement and trade partners critical to investigating and dismantling illicit opioid supply chains. HSI will expand key TCIUs and train foreign partner agencies on supply chain exploitation. Expanding foreign partner capacity will increase law enforcement action abroad, reducing the international supply of illicit opioids and developing intelligence that will advance HSI domestic investigations.

These operational expansions must be paired with appropriate bilateral and multilateral engagement. HSI will strengthen its relationship with the World Customs Organization (WCO) and seek to leverage WCO enforcement capabilities to illuminate and target precursor chemical shipments, shippers, and brokers linked to illicit opioid synthesis.

HSI will accomplish these objectives through its robust international footprint, which represents the largest international investigative presence of all DHS components and comprises hundreds of HSI special agents and HSI foreign service national investigators strategically assigned to 91 offices in 54 countries. This includes personnel assigned to offices located throughout Mexico where most of the fentanyl that wreaks havoc on Americans is produced, as well as offices in China and throughout the Asia-Pacific region where most precursor chemicals originate or transit.



A. Expand Operations Focused on Disrupting the Drug Precursor Supply Chain

Dismantling precursor chemical supply chains remains the most effective approach to stemming the flow of opioids into the United States. Disruptions to the narcotics production supply chain during the procurement phase have a substantial impact on the quantity of drugs encountered at our borders and on our streets. HSI will continue targeting air and maritime commercial transportation modalities based on investigative information. Resulting interdictions deny the cartels the materials necessary to produce narcotics and assist in garnering the evidence necessary to create criminal cases against the organizations facilitating narcotic synthesis.

As the leader in supply chain-focused investigations, HSI will expand upon proven initiatives and continue to develop innovative investigative strategies designed to combat the synthesis of illicit opioids. This force-multiplying effort will result in the generation of additional supply chainfocused investigations, leading to further disruption and dismantlement of TCOs and their drug synthesis capabilities.

B. Establish an HSI Counter Precursor Chemical National Program Manager

Investigations resulting in the dismantlement of drug precursor supply chains require resourcing, coordination, and ever-evolving, specialized training to ensure agents are aware of current TCO procurement methods and the most effective law enforcement investigative strategies. The HSI national program manager will serve as a subject matter expert on drug precursor supply chains, precursor chemical seizure and forfeiture, and as a repository of investigative best practices. The national program manager will also track and coordinate precursor chemical investigations, compile statistics, provide training to domestic and international HSI investigators, disseminate leads, and identify routes and pathways used by criminal organizations to move precursors into foreign countries.

C. Expand the HSI Mexico Transnational Criminal Investigative Unit to Allow for Additional Counter-Illicit Opioid Activities

The TCIU Program is HSI's primary mechanism for achieving law enforcement outcomes abroad, including the interdiction of precursor chemicals, the shuttering of clandestine fentanyl labs, and the arrest of drug traffickers. HSI TCIUs are composed of host country law enforcement officials, including Customs officers, immigration officers, and prosecutors who undergo a stringent vetting process. HSI TCIUs facilitate information exchange and bilateral investigations involving violations within HSI's investigative authority, including illicit opioid production and trafficking and the associated crimes of weapons trafficking, money laundering, and cybercrime. TCIUs enhance the host country's ability to investigate and prosecute individuals involved in transnational criminal activity within their jurisdictions, often resulting in disruptions of criminal enterprises also engaged in illegal activity in the United States.

The HSI Mexico TCIU is a key asset in the fight against illicit opioids destined for American communities. The officers and prosecutors assigned to the Mexico TCIU deploy to locations across the country in



furtherance of high-profile investigations targeting Mexican cartels and other TCOs. In Fiscal Year 2025, HSI Mexico will aggressively expand the Mexico TCIU and implement several operational changes to enhance productivity and focus on illicit opioid manufacturing.

D. Provide Capacity Building Training to Foreign Counterparts on Illegal Transshipment and Diversion of Precursor Chemicals

The illicit opioid precursor chemical supply chain currently operates predominately outside the borders of the United States. Accordingly, disruption of this supply chain is highly dependent on foreign partner engagement. To help achieve this outcome, HSI will provide capacity building training to foreign counterparts focused on the methodologies surrounding precursor chemical acquisition and illegal end use as well as related red flag indicators. This will increase foreign partners' ability to identify bad actors within their jurisdictions and to act within their authorities, ultimately disrupting the synthesis of illicit opioids destined for the United States and providing valuable intelligence to advance HSI domestic investigations.

E. Increase Engagement with the World Customs Organization

The WCO is a powerful mechanism for sharing Customs information and coordinating enforcement among foreign counterparts. As the U.S. representative member of the WCO, HSI has coordinated previous enforcement actions through the WCO to combat precursor chemicals used in the production of cocaine and improvised explosive devices. HSI will seek to engage with the WCO to leverage its member countries and international infrastructure to identify and target key precursor shipments and the ill-intended organizations and individuals receiving them.

F. Increase HSI Engagement in the ONDCP U.S. – Canada Opioids Action Plan Enforcement Working Group

The Office of National Drug Control Policy (ONDCP) United States – Canada Opioids Action Plan (OAP) Law Enforcement Working Group focuses on enhancing areas of cooperation such as sharing best practices for targeting synthetic drug precursors. To enhance the abilities of Canadian law enforcement, HSI is planning a series of engagements, meetings, and trainings with Canadian counterparts to increase their ability to target precursor chemicals and illicit drug labs within their country.

Goal 2: Reduce the Domestic Supply of Illicit Opioids



The illicit drug supply chain bringing opioids to the American people begins abroad and ends on Main Street. The drugs



smuggled through Southwest Border POEs fuel overdose deaths in communities across the country. HSI, through its unique mandate and authorities, investigates and thwarts this activity from the border to the heartland. No other agency encounters the breadth of illicit opioid-related activity throughout the global supply chain.

Domestically, HSI covers the nation through 253 offices located in all 50 states, Washington D.C., and the U.S. territories of Puerto Rico, United States Virgin Islands, Guam, and Saipan. Each office dedicates assets to combat the flow of illicit opioids with remarkable results. In Fiscal Year 2022, HSI narcotics enforcement efforts resulted in 11,612 arrests as well as the seizure of 28,689 lbs. of opioids – including 20,981 lbs. of fentanyl – and over \$210 million in illicit proceeds.

As part of an aggressive strategy to counter illicit opioid trafficking, HSI will augment staffing at Southwest Border POEs in anticipation of increased narcotics detections and reorient its existing task forces toward combating the opioid crisis. Further, POE offices will pursue judicial efficiencies to increase the effectiveness of investigative techniques linking opioid activity in the heartland to illegal border smuggling and expand HSI's involvement in interagency task forces. HSI's activities at POEs will be done in close coordination with CBP to ensure the maximum opportunity for operational and prosecutorial success.

A. Leverage HSI Authorities and New Appropriations to Bolster U.S. Border Security

Most of the opioids flooding American streets are smuggled across the Southwest Border. HSI is the primary federal law enforcement agency responsible for investigating drug smuggling and other criminal activity occurring at land, air, and sea POEs. HSI special agents work closely with CBP officers to identify and seize illicit opioids, and to investigate those organizations attempting to introduce illicit contraband into the United States. This includes leveraging HSI's unique Customs authorities to develop supply chain-focused cases.

Based on Fiscal Year 2022 appropriations, HSI will deploy additional special agents to Southwest Border POEs in Fiscal Year 2023 in response to the increasing rate of vehicular non-intrusive inspection (NII) required by the Securing America's Ports Act. Vehicular smuggling remains a primary method for illegally moving illicit opioids into the United States. These additional special agents will augment HSI's substantial Southwest Border presence and investigate the increased number of seizures originated by CBP due to NII expansion.

B. Increase the Number of HSI Task Forces and Strengthen their Ability to Investigate Illicit Opioids.

HSI's approach to dismantling TCOs focuses on disrupting multiple aspects of their polycriminal nature by targeting their narcotics trafficking, human and weapons smuggling, illicit finance, and cybercrime activities. HSI's task forces, which are similarly multiprogrammatic, include the flagship Border Enforcement Security Task Force (BEST) Program, whose mission is to combat emerging and existing transnational organized crime. There are currently 86 BESTs comprising more than 2,000 law enforcement officers and personnel representing more than 200 federal, state, local, tribal, and international law



enforcement agencies as well as National Guard units.

To combat rising overdoses, HSI will increase the number of BESTs and sharpen their focus on illicit opioid trafficking. HSI will also increase the effectiveness of its task forces' counter-opioid efforts by identifying and spreading awareness of innovative best practices developed by individual SAC offices, which often serve as proving grounds for creating and testing new techniques. Implementation of proven counter-opioid techniques in new locations will synchronize agency efforts and improve efficacy.

C. Expand HSI Participation in Inter-Agency Task Forces and Pursue New Initiatives

HSI counternarcotics efforts are enhanced through its network of federal, state, local, and tribal partnerships, which includes participation in the High Intensity Drug Trafficking Areas (HIDTA) Program and Organized Crime Drug Enforcement Task Forces (OCDETF) Program, as well important regional and city-level task forces. These partnerships enable HSI special agents to collaborate in investigations using HSI's unique and far-reaching authorities, resulting in investigative success impossible without HSI involvement.

For instance, the OCDETF Executive Office has broadened its scope from a sole focus on narcotics to concentrating on all transnational organized crime investigations. This development allows for novel coordination among HSI investigations traditionally outside of OCDETF purview, such as human and weapons trafficking. This better aligns OCDETF's mission with HSI's multi-programmatic approach to dismantling TCOs. HSI anticipates this expansion of OCDETF's aperture will lead to an increase in HSI OCDETF-designated cases, including new strategic initiatives. This will reveal new connections between investigations spanning the TCOs' spectrum of criminal activity, including illicit opioids.

In Fiscal Year 2023, HSI will lead or increase participation across several partnerships targeting the illicit opioid trade directly and indirectly. HSI recently created an initiative with the Office of Foreign Assets Control, for example. This initiative will target culpable foreign individuals and companies with the goal of imposing economic and trade sanctions, when appropriate, and identifying new source countries and smuggling methods. HSI also leads HIDTA initiatives focused on disrupting and dismantling internet-based sales of fentanyl and other opioids.

Goal 3: Attack the Enablers of Illicit Opioid Trafficking: Illicit Finance, Cybercrime, and Weapons Smuggling



Illicit opioid manufacturing and distribution requires global trade, communication, and finance. The organizations operating these



networks share common characteristics and exhibit identifiable, ongoing patterns of behavior. HSI exploits these patterns to identify both members of these organizations and those who enable their criminal activities.

Through increased identification of the relationship between legitimate commerce and these organizations, HSI will align its investigative efforts with existing global commerce. Each customer, regulatory, or law enforcement contact will potentially become an initiation point for investigation. Consequently, HSI can target criminal enterprises at every level of operation, overcoming serious investigative impediments. Properly associating this information will augment existing cases and generate novel investigative leads.

The objectives described in this section will help HSI and its partners combat modern TCOs involved in a wide spectrum of criminal activity, including illicit opioid trafficking.

A. Establish the Cross-Border Financial Crime Center

Profit is the primary motive behind the production and sale of illicit drugs. Accordingly, one of the most effective methods for dismantling Mexican cartels and other TCOs engaged in narcotics trafficking is to pursue the criminal proceeds that are the lifeblood of their operations. Mexican TCOs continue to use elaborate international systems to launder money and hide and protect the secrecy of their illgotten wealth. Common methods used by TCOs include bulk cash smuggling, tradebased money laundering, Chinese money laundering organizations, opaque corporate structures, and money service businesses. With significant access to financial and trade data, HSI is uniquely positioned to identify these TCO schemes used to hide illegal drug proceeds.

HSI will leverage this unique position to establish the Cross-Border Financial Crime Center (CBFCC). This Center will be a partnership between federal law enforcement agencies, partner nation authorities, U.S. regulatory organizations, banks and other financial institutions, and financial technology companies aimed at achieving enhanced information sharing on financial crime and the illicit use of cryptocurrencies.

The Center will directly support the prosecution, disruption, and dismantlement of TCOs and other criminal actors engaged in illicit cross-border financial activity. Additionally, the Center will strengthen the anti-money laundering infrastructure of the United States; enhance information sharing between the United States Government and the private sector regarding techniques and trends used in crimes involving illicit crossborder financial activity; and increase cooperation between domestic and foreign law enforcement agencies with respect to combating such crimes.

B. Use the Bulk Cash Smuggling Center to Target the Repatriation of Illicit Proceeds Through Bulk Currency Smuggling

HSI's National Bulk Cash Smuggling Center (BCSC) is a critical component of the United States' efforts to combat bulk cash smuggling by Mexican cartels and other TCOs. The BCSC operates strategic programs that leverage advanced data analytics, interagency partnerships, and law enforcement technology systems to identify



complex money laundering networks and provide support for HSI financial investigations.

In Fiscal Year 2023, HSI will emphasize the regular publication of intelligence products specific to money laundering and the movement of illicit assets. These products will be designed to increase awareness of emerging trends in TCO financial networks, provide geographically specific financial intelligence, and publicize BCSC support programs available to HSI and other law enforcement partners.

The BCSC will also increase support to financial investigations specific to the Southwest Border Region and Mexico through existing programs and new initiatives that will identify and target bulk cash smuggling networks.

C. Disrupt Trade-Based Money Laundering Through Data Exchange with Foreign Partners

TCOs routinely exploit global trade to launder proceeds derived from their illicit activities, including opioid trafficking. To combat this, HSI's Trade Transparency Unit (TTU) uses Memorandums of Understanding (MOUs) to facilitate the exchange of trade data with foreign partners. HSI is the only federal law enforcement agency with the capacity and technology to exchange trade data with foreign governments in furtherance of trade-based money laundering (TBML) investigations. By combining foreign and U.S. data, the TTU can identify and disrupt TBML schemes used to move and launder illicit proceeds.

In Fiscal Year 2023, TTU will finalize new data sharing MOUs with federal partners,

add new nations to the trade data sharing agreements, and increase investigative support to HSI's Certified Undercover Operations that target suspicious trade and financial activity.

D. Leverage the HSI Cyber Crimes Center to Support Illicit Opioid Investigations Through Cryptocurrency Analytics, Support for Online Undercover Activities, and Cutting-Edge Training

To keep pace with rapidly evolving criminal techniques, HSI created the Cyber Crimes Center (C3). C3 provides programmatic oversight and coordination of investigations involving cyber-related criminal activity and a range of forensic, intelligence, and investigative support services. Currently, C3 personnel are developing a robust cryptocurrency analytics and lead generation program. This program will also connect HSI's cadre of cryptocurrency subject matter experts with field agents worldwide. Additionally, in Fiscal Year 2023, C3 will initiate multiple undercover operations targeting transnational cybercrime organizations and destabilizing dark web marketplaces. While previous endeavors have proven successful, these operations will be focused on bringing innovative solutions to field investigations in a scalable manner.

In addition to these efforts, C3 will continue to administer its cyber-training curriculum. These courses focus on dark web investigations and illicit payment networks associated with opioid smuggling and distribution. This training has been successful in improving law enforcement capabilities against online marketplaces and tools for illicit trafficking. Since 2017, HSI has delivered this training course in over 70 locations worldwide to more than 15,000



federal, state, local, and international law enforcement personnel.

E. Continue Proven Operations Targeting the Flow of Illegal Weapons Exports to Mexico

The smuggling of firearms from the United States into Mexico provides a mechanism for the cartels to threaten Mexican law enforcement efforts to combat illicit opioid production. HSI leverages its customs authorities to target weapons moving south into Mexico as well as to focus on active procurement networks in the United States. Operation Without a Trace (WaT), a unified DHS effort to fight the illegal trafficking of guns and ammunition from the United States into Mexico, is a significant component of this endeavor. WaT is a federal partnership among HSI, CBP, the Bureau of Alcohol, Tobacco, Firearms and Explosives, and the Government of Mexico focused on the illicit purchase, transport, and distribution of firearms, firearms components, and ammunition from the United States to Mexico. It is one of only three whole of government efforts recognized by the White House's National Security Council to combat this threat. WaT's three-pronged approach leverages criminal intelligence analysis, interdiction, and investigative assets to identify, disrupt, and dismantle transnational criminal organizations trafficking in firearms. During Fiscal Year 2022, WaT partners initiated 272 criminal investigations resulting in 302 arrests and seizure of 514 firearms, 1,019 magazines, and more than 284,000 rounds of ammunition, all destined for TCOs in Mexico.

Goal 4: Conduct Outreach with Private Industry



The effects of the opioid epidemic have touched every corner of our country and extend to some partner nations. To be effective, the U.S. response must be equally expansive. HSI will strengthen existing partnerships and launch new outreach initiatives to enhance its investigations. This includes educating private industry partners on the techniques criminal organizations use to exploit legitimate systems for illicit ends and encouraging action to resolve known vulnerabilities.

A. Establish the Chemical Industry Outreach Project

Currently, Mexican cartels generally source chemicals used in the production of drugs from Asia. There are indications, however, that certain key chemicals originate from the United States. HSI will establish the Chemical Industry Outreach Project to



proactively engage domestic chemical companies exporting licit precursor chemicals to Mexico and Central America to counter this trend. The purpose of the outreach is to inform private sector companies of red flag indicators of involvement with bad actors. This helps to prove intent should the company become involved with illicit procurers and may also lead to insights into the industry supply chain and transportation methods.

B. Enhance Narcotics Enforcement Agreements with Express Consignment Carriers

Perceived anonymity and minimal risk to TCO personnel continue to draw large numbers of traffickers to employ express consignment carriers in transporting synthetic opioids and other contraband globally. As such, HSI is uniquely positioned to leverage private sector relationships, data collected through the DHS enterprise, traditional investigative methods, and aid from foreign counterparts to enhance targeting efforts already proven highly impactful to HSI opioid investigations. Unfortunately, mechanisms for coordinating with express consignment operators (ECOs) often remain underdeveloped. One opportunity to advance information exchange between HSI and ECOs is to establish or enhance existing Narcotics Enforcement Agreements (NEAs), which are required for carrier exemption status. The agreements mandate the development of industrywide best practices for cooperation with HSI and CBP and include automated screening algorithms informed by law enforcement metrics. In addition to dedicating increased resources under the auspices of BESTs to express consignment operations, HSI will engage

with ECOs to implement new NEAs and ensure compliance with existing agreements.

Conclusion



he United States continues to be ravaged by an ever-growing supply of illicit drugs, including synthetic opioids, that have become the leading cause of overdose deaths in the country. HSI's authorities and dynamic approach to counternarcotics produces impactful investigations that disrupt, dismantle, and prosecute the TCOs responsible for this public health crisis. While HSI's collective efforts are executed with an unrelenting commitment to public safety, we recognize that work remains at all levels: internationally, on the border, and in our communities. Through enhanced efforts consistent with those described in the elements of the *Strategy for Combating* Illicit Opioids, HSI will make greater strides toward dismantling the organizations that place these dangerous drugs in the hands of the American people.





