



NAVAL POSTGRADUATE SCHOOL

MONTEREY, CALIFORNIA

THESIS

**PREVENTING BULK CASH AND WEAPONS
SMUGGLING INTO MEXICO: ESTABLISHING AN
OUTBOUND POLICY ON THE SOUTHWEST BORDER
FOR CUSTOMS AND BORDER PROTECTION**

by

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December 2010

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REPORT DOCUMENTATION PAGE			Form Approved OMB No. 0704-0188	
Public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instruction, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington headquarters Services, Directorate for Information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington, VA 22202-4302, and to the Office of Management and Budget, Paperwork Reduction Project (0704-0188) Washington DC 20503.				
1. AGENCY USE ONLY (Leave blank)		2. REPORT DATE December 2010	3. REPORT TYPE AND DATES COVERED Master's Thesis	
4. TITLE AND SUBTITLE Preventing Bulk Cash and Weapons Smuggling into Mexico: Establishing an Outbound Policy for the Southwest Border for Customs and Border Protection			5. FUNDING NUMBERS	
6. AUTHOR(S) Beverly Good				
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) Naval Postgraduate School Monterey, CA 93943-5000			8. PERFORMING ORGANIZATION REPORT NUMBER	
9. SPONSORING /MONITORING AGENCY NAME(S) AND ADDRESS(ES) N/A			10. SPONSORING/MONITORING AGENCY REPORT NUMBER	
11. SUPPLEMENTARY NOTES The views expressed in this thesis are those of the author and do not reflect the official policy or position of the Department of Defense or the U.S. Government. IRB Protocol number _____.				
12a. DISTRIBUTION / AVAILABILITY STATEMENT Approved for public release; distribution is unlimited			12b. DISTRIBUTION CODE	
13. ABSTRACT (maximum 200 words) U.S. Customs and Border Protection (CBP) is the agency responsible for securing the borders of the United States from those people and things that would do the United States harm. The Office of Field Operations (OFO) is the office responsible for securing the Ports of Entry (POEs). CBP/OFO has dedicated personnel, technology, infrastructure and resources assigned to the inbound inspections for processing those travelers and inbound processing has been a national priority of CBP since its inception in 2003. Although CBP/OFO has the authority to conduct outbound inspections, there is little infrastructure, intelligence sharing or technology at the POEs for conducting outbound operations. Some POEs are conducting outbound operations with officers that have been taken from the inbound staffing models. However, at the time of writing this thesis, CBP does not have a national policy mandating POEs conduct outbound operations. On the Southwest Border (SWB), the Mexican Drug Trafficking Organizations (DTOs) are continuing to smuggle bulk cash and weapons into Mexico and border violence continues to increase. This thesis makes a recommendation of what the best policy option for outbound operations would be to implement on the SWB.				
14. SUBJECT TERMS Outbound, Policy, Intelligence, Sharing, Hybrid, Mirror, Status Quo			15. NUMBER OF PAGES 99	
			16. PRICE CODE	
17. SECURITY CLASSIFICATION OF REPORT Unclassified	18. SECURITY CLASSIFICATION OF THIS PAGE Unclassified	19. SECURITY CLASSIFICATION OF ABSTRACT Unclassified	20. LIMITATION OF ABSTRACT UU	

NSN 7540-01-280-5500

Standard Form 298 (Rev. 8-98)
Prescribed by ANSI Std. Z39.18

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ESTABLISHING AN OUTBOUND POLICY FOR THE SOUTHWEST BORDER
FOR CUSTOMS AND BORDER PROTECTION**

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Submitted in partial fulfillment of the
requirements for the degree of

**MASTER OF ARTS IN SECURITY STUDIES
(HOMELAND SECURITY AND DEFENSE)**

from the

**NAVAL POSTGRADUATE SCHOOL
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ABSTRACT

U.S. Customs and Border Protection (CBP) is the agency responsible for securing the borders of the United States from those people and things that would do the United States harm. The Office of Field Operations (OFO) is the office responsible for securing the Ports of Entry (POEs). CBP/OFO has dedicated personnel, technology, infrastructure and resources assigned to the inbound inspections for processing those travelers and inbound processing has been a national priority of CBP since its inception in 2003. Although CBP/OFO has the authority to conduct outbound inspections, there is little infrastructure, intelligence sharing or technology at the POEs for conducting outbound operations. Some POEs are conducting outbound operations with officers that have been taken from the inbound staffing models. However, at the time of writing this thesis, CBP does not have a national policy mandating POEs conduct outbound operations. On the Southwest Border (SWB), the Mexican Drug Trafficking Organizations (DTOs) are continuing to smuggle bulk cash and weapons into Mexico and border violence continues to increase. This thesis makes a recommendation of what the best policy option for outbound operations would be to implement on the SWB.

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LIST OF ACRONYMS AND ABBREVIATIONS

ATF	Alcohol, Tobacco, Firearms and Explosives
BEST	Border Enforcement Security Task Force
CBP	Customs and Border Protection
CBP/OFO	Customs and Border Protection/Office of Field Operations
DEA	Drug Enforcement Administration
DHS	Department of Homeland Security
DMIA	Data Management Improvement Act of 2000
DOJ	Department of Justice
DTOs	Drug Trafficking Organizations
DWI	Driving While under the Influence
EU	European Union
GAO	Government Accountability Office
GS	General Scale
ICE	Immigration and Customs Enforcement
IIRIRA	Illegal Immigration Reform and Immigrant Responsibility Act of 1996
INS	Immigration and Naturalization Service
OBP	Office of Border Patrol
OFO	Office of Field Operations
POE	Port of Entry
PPAE	Planning, Program Analysis and Evaluation
SWB	Southwest Border
UK	United Kingdom
U.S.	United States
USDA	United States Department of Agriculture
US-VISIT	U.S. Visit and Immigrant Status Indicator Program
WHTI	Western Hemisphere Travel Initiative

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ACKNOWLEDGMENTS

First, I would like to thank my husband, Kelly for watching the television with the volume turned down so that I could get my schoolwork done. However, seriously, I could not have done this without your love and support throughout this process. I would also like to thank my mom, my dad, Janet, my sisters and brothers and the rest of my family for cheering me on. I love you all!

To my friends who understood when I could not spend time with them during this process and who supported me and gave me words of encouragement the entire way, I thank you!

I would also like to thank my classmates who continued to check on me to get this thesis done! I will miss you guys!

Lastly, I would like to thank all of the men and women of CBP that work so hard every day to help keep America safe. I go on the journey with you everyday and am grateful to each of you!

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I. INTRODUCTION

U.S. Customs and Border Protection (CBP) is the agency responsible for securing the borders of the United States from those people and things that would do the United States harm. The Office of Field Operations (OFO) is the office responsible for securing the Ports of Entry (POEs). CBP enforces the import and export laws and regulations at the POEs in addition to immigration and agriculture laws and regulations. CBP/OFO has dedicated personnel, technology, infrastructure and resources assigned to the inbound inspections for processing those travelers and goods attempting to enter the United States. Inbound processing and the expediting of legitimate travelers and trade into the United States has been a national priority of CBP since its inception in 2003.

Although Customs and Border Protection/Office of Field Operations (CBP/OFO) has the authority to conduct outbound inspections, little infrastructure and technology exists at the POEs for conducting outbound operations. Some POEs are conducting outbound inspections with officers that have been taken from the inbound staffing models. However, at the time of writing this thesis, CBP does not have a national policy mandating POEs conduct outbound operations.

On the Southwest Border (SWB), the Mexican Drug Trafficking Organizations (DTOs) are continuing to smuggle bulk cash and weapons into Mexico and border violence continues to increase. This thesis makes a recommendation of what the best policy option would be to implement on the SWB. This thesis does not focus on air or sea POEs or any of the northern land border POEs. However, that does not mean that the same policy could not be implemented or adjusted for the northern land border POEs to address the threat that CBP faces in that environment.

A. PROBLEM STATEMENT

The lack of an outbound policy on the SWB inhibits the ability of CBP to detect persons attempting to export undeclared currency over \$10,000, ammunition and weapons into Mexico. It also hinders the ability to track people, vehicles and other items or merchandise departing the United States.

Individuals wanted as possible criminals or terrorists can utilize this weakness and exit into Mexico undetected. In addition, the smuggling of bulk cash into Mexico allows the Mexican DTOs to continue to produce, smuggle and distribute narcotics in the United States. The smuggling of the weapons into Mexico allows the DTOs to continue to combat Mexican law enforcement, the military and other rival cartels and sustain their operations and violence.

The 2010 National Drug Threat Assessment published in February 2010 by the U.S. Department of Justice (DOJ) described the Mexican DTOs as the greatest drug trafficking threat to the United States (DOJ, 2010, p. 9). In 2010, DOJ stated that the Mexican DTOs are active in more cities in the United States than any other DTO (DOJ, 2010, p. 9). President Calderon of Mexico and President Obama agree that the weapons and currency smuggling from the United States into Mexico is a threat that must be addressed (Beittel, 2009, p. 2).

The U.S. Patriot Act made money laundering more difficult for DTOs to place proceeds from illicit drugs sales in U.S. institutions. Thus, the Mexican DTOs use bulk cash smuggling out of the United States into Mexico as the primary method for moving their profits (DOJ, 2010, p. 9). Tens of billions of dollars are smuggled into Mexico via POEs on the SWB each year (DOJ, 2010, p. 47).

In addition to bulk cash smuggling, the Mexican DTOs purchase high-powered weapons to smuggle them back into Mexico via the SWB. According to the Bureau of Alcohol, Tobacco, Firearms and Explosives, (ATF), the DTOs acquire thousands of weapons each year and smuggle the weapons into Mexico via the SWB (DOJ, 2010, p. 2). These weapons are used to control territory in

Mexico and drug smuggling routes inside both Mexico and the United States. In addition, the weapons allow the DTOs to combat Mexican law enforcement and military forces.

The United States has a high demand for the importation of illicit narcotics and it is one of the highest demand countries in the world. The rise in illicit importation, distribution and use of drugs in the United States goes against what the United States represents. The profits of this illicit activity fund terror, which corrode the democracy upon which the United States is built. All these issues represent a threat to U.S. national security (Hutchinson, 2002, p. 1).

The free flow of illicit proceeds from narcotics into Mexico allows the DTOs to pay their operating costs, bribe Mexican and U.S. law enforcement and government officials (Farah, 2010, p. 11). The ability to continue to export bulk cash on the SWB means that the DTOs can continue producing and distributing the very drugs being smuggled into the United States and sold on U.S. streets.

POEs that do have CBP officers working southbound traffic (outbound) do so with little to no infrastructure to stop vehicles or pedestrians to determine if they are involved in illegal activities. The lack of an outbound policy and infrastructure across the SWB is a homeland security issue because of the effects of the DTO's illicit activities carried out in the United States across the entire SWB. In addition, the lack of an outbound infrastructure also significantly decreases the Department of Homeland Security's ability to track departures of people and vehicles from the United States on the SWB.

The SWB does not possess the facilities or resources mirroring the entry process along the SWB that would allow for enhanced screening and secondary processing to identify those persons or vehicles departing the United States. The SWB also cannot ascertain what those people and vehicles are transporting. CBP/OFO does limited outbound checks with the few resources available to

them, and in many cases, with little to no intelligence from the U.S. intelligence community of foreign partners, which limits the ability of the CBP/OFO to be successful in detecting bulk cash and weapons smuggling on the SWB.

B. RESEARCH QUESTION(S)

What type of outbound policy needs to be developed and implemented on the SWB to maximize CBP's ability to identify bulk cash and weapons being smuggled into Mexico?

What are the policy options, applicable strengths and weaknesses of each policy and a recommended policy?

C. RESEARCH METHODOLOGY

This thesis develops three alternatives for potential outbound policies for the SWB and analyzes each policy option using two POEs currently conducting outbound operations on the SWB to determine which alternative presented is the most viable to implement. This policy option focuses on identifying bulk cash and weapons on the SWB.

1. Policy Options Analysis

The possible policy options for addressing this issue range from continuing to operate under the status quo, which is a hit or miss option for detecting bulk cash and weapons smuggling destined for Mexico, to mirroring the inbound solution in the outbound environment at each SWB POE, to a hybrid model that would include some infrastructure, personnel, technology and additional intelligence sharing from federal, state and local law enforcement entities.

a. Option A—Status Quo

The first policy option would be to keep the status quo and not change the way that CBP is currently conducting outbound inspections on the

SWB. As of the writing of this thesis, a CBP policy that articulates the primary and secondary goals of the outbound program does not exist. Some POEs on the SWB have officers dedicated to outbound inspections and some POEs do not. Option A intends for the SWB POEs to continue to operate as they are currently. This policy option would allow management to determine local needs focusing on inbound inspections and other priorities.

b. Policy Option B—Mirror the Inbound Solution

The second policy option would be to mirror the inbound inspection process and infrastructure. Key to mirroring an inbound inspection process in the outbound environment would be the design and implementation of the infrastructure to accommodate facilities for primary and secondary inspections on both vehicles and pedestrians entering Mexico. In addition, the infrastructure to interview, search and detain vehicles and cars that are potential violators or subjects of interest to CBP would be required. This option would take the current infrastructure and personnel in the inbound environment and place it in the outbound environment as a solution for outbound inspections on the SWB.

c. Policy Option C—Hybrid

The hybrid policy option would focus on individual POEs and assess what infrastructure is currently in place in the outbound environment and what could be put into place to allow officers to work outbound operations more frequently. The hybrid solution would call for some infrastructure upgrades on a site-by-site basis. As the infrastructure is being assessed on an individual basis for each POE, a technology assessment could go hand and hand with that assessment. A determination could be made to identify what technology could be put in place for outbound officers to provide them a better chance of identifying those vehicles, and pedestrians who are potential terrorists, DTO members, targets of investigations or wanted for a crime. Additional personnel would be required for operating in whatever additional infrastructure and technology

implemented. A key component to the hybrid solution is an intelligence-based network possibly established at the highest levels in the Department of Homeland Security and CBP. This network should focus on both internal and external stakeholders to maximize CBP's ability to identify targets of bulk cash and weapons smugglers.

2. Assessment Criteria

The criteria for judging each option is to assess two POEs currently performing outbound inspections and review how each policy option works at each of the two locations. The Lincoln-Juarez Bridge POE in Laredo, Texas and the San Ysidro POE are the two POEs examined for each policy option because they are both currently conducting outbound operations. Each location has assigned personnel and do pulse surge operations similar to a Driving While under the Influence (DWI) checkpoint that state and local police departments perform randomly. The idea is for inspections to be performed at random times of the day with different days off.

The Lincoln-Bridge in Laredo, Texas was chosen because the officers performing outbound inspections have been conducting these operations for several years, and in 2009, they were the most successful in identifying bulk cash and weapons being smuggled into Mexico. San Ysidro has a fairly new outbound team but did identify attempts to smuggle some bulk cash into Mexico in 2009. Both locations have dedicated personnel working on the outbound teams. The Lincoln-Juarez Bridge does have some infrastructure and some technology in the southbound lanes leading into Mexico while San Ysidro has little to no infrastructure for outbound inspections. Lincoln-Juarez Bridge is located on a city road with stoplights every block that slows down traffic as the vehicles approach the outbound officers. The San Ysidro outbound teams work on a high volume interstate where the cars are traveling in excess of over 70 miles an hour. The San Ysidro outbound team must set up on the freeway using

government vehicles and cones to block lanes to slow down traffic before approaching the outbound officers. In addition to the above criteria, the author has been to both locations and viewed outbound operations at each.

Each POE is examined to determine how each policy option would benefit their outbound efforts or inhibit them and how feasible they are to implement. The criteria in each option for determining the best possible solution is to assess the amount of bulk cash detected, the amount of weapons seizures identified, ease of implementation, cost of each option and the free flow of traffic. These criteria are important because the goal of the policy recommendation is to prevent bulk cash and weapons smuggling into Mexico. To do so, CBP needs to increase the ability to detect more bulk cash and weapons destined for Mexico. The ease of implementation must be reviewed to determine if an option is feasible and how many barriers are in the way of implementing the options. The ability to maintain the free flow of traffic is one of the missions of CBP and has high visibility within the private and public sector of the communities. The costs of each policy option provide a high-level view of how much it takes to implement a policy option. Together, the criteria are analyzed to determine the best policy option to be implemented.

Based on the bulk cash detected, the assessing criteria ranges from low to high. Low means that the policy option does not enhance the ability for CBP to detect more bulk cash and that less than \$5 million dollars are identified using a policy option. Medium indicates that up to \$10 million may be detected if a policy option were implemented and that over \$10 million dollars in bulk cash is detected if a policy option were to be implemented.

Based on weapons seizures, the assessment criterion is the same as the weapons except for the amount of weapons seizures. Low means that the policy option is likely to detect less than 10 weapons seizures; medium detects up to 20 and high signifies that the implementation of the policy option provides the POE with over 21 weapons seizures.

The ease of implementation of each policy option is dependent upon how many barriers the CBP must overcome in each location. For example, the requirement to purchase property rights to expand the POE for southbound operations, the ability to acquire a budget, and the ability to assign officers to the outbound environment are some barriers that the POEs may need to overcome. Easy indicates that one barrier must be overcome; medium indicates 2–3 barriers to overcome and difficult indicates four or more barriers to overcome to implement a policy option.

The cost indicates the amount it would take to implement an individual solution. For the purposes of this thesis, the items for the cost criteria to assess each policy option are limited to the lanes, personnel and a rough estimate on an outreach campaign. This thesis does not provide a full cost estimate to be used if a policy option is implemented but does provide an overall view of the differences in each option. Low indicates that the policy option costs less than \$10 million to implement; medium is less than \$20 million; and high indicates that the policy option costs over \$20 million dollars to implement.

The free flow of traffic denotes how long the wait times would be if a policy option were implemented. High flow of traffic indicates that the free flow is less than a 10-minute wait time to reach the outbound inspection, medium is a wait time of less than 20 minutes and low is a wait time of 21 minutes or more.

	Policy A- Status Quo	Policy B- Mirror Inbound	Policy C- Hybrid
Amount of Bulk Cash Detected	Low	High	High
Number of Weapons Seizures	Low	Medium	High
Ease of Implementation	Easy	Difficult	Medium
Cost	Low	High	Medium
Free Flow of Traffic	High	Low	High

Table 1. Assessment Criteria

Each criteria is examined together to determine the best policy option for CBP to implement. The ideal policy option would be to have the amount of bulk cash detected as high; the amount of weapons seizures as high; the ease of implementation as easy; the cost low and the free flow of traffic as high. The policy option that is feasible to implement and is the closest to the perfect criteria is the policy option recommended for implementation on the SWB.

D. SIGNIFICANCE OF RESEARCH

The research for this thesis on an outbound policy for CBP on the SWB will compliment the current literature available on the subject. It will provide a policy approach to address the issues of arms and bulk cash smuggling across the SWB. Policy makers will be able to use this thesis as a basis for implementation of future work on an outbound policy for CBP.

The immediate consumer of this research will be the management of CBP, the agency responsible for developing and implementing policy for the SWB as it relates to people and goods crossing both into and out of the United States.

The goal of this research and execution of this thesis is to develop a feasible outbound policy for the SWB that CBP can implement. The analysis of the policy options uses two POEs to identify which solution is the best for CBP to implement.

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II. LITERATURE REVIEW

This literature review focused mainly on identifying relevant sources for potential solutions for developing an outbound policy for the SWB at the land border POEs. A fair number of sources were discovered that related to an outbound or exit solution. The documents reviewed in support of the literature review are statutes, U.S. and foreign government reports, academic studies on border issues, press analyses, and operational policy or planning documents from various U.S. government operational components.

The sources have been organized into the following categories.

- Authority for CBP to conduct outbound operations at the land border POEs
- Congressional reports relating to entry/exit programs implemented by DHS thus far at the POEs
- Foreign government practices for exit control
- Current DHS processes on outbound activities
- Alternatives for disrupting weapon smuggling

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III. CBP'S MANAGEMENT OF POES

U.S. CBP was established in 2003, which combined multiple agencies with different missions. The Homeland Security Act of 2002 abolished the Immigration and Naturalization Service and placed the Border Patrol and the Office of Inspections under CBP. The U.S. Customs Service, with the exception of the Office of Investigations and Agriculture specialists from the United States Department of Agriculture (USDA), were also placed with CBP under the Department of Homeland Security. CBP's mission is to keep terrorists and weapons of mass destruction out of the United States while securing and facilitating trade and travel, and enforcing agriculture, drug and immigration regulations (<http://cbp.gov/xp/cgov/about/>).

CBP has three operational components. The Office of Air and Marine is responsible for patrolling the nation's air and sea borders to stop terrorists and drug smugglers before they enter the United States. The Office of Border Patrol is responsible for preventing illegal entry of people and contraband between the POEs. The Office of Field Operations has officers stationed at official POEs to protect the United States from the illegal entry of aliens, contraband and pests into the United States.

A POE is an official term used to describe a legal point of entry between a foreign country and the United States. A POE can be an air, land or sea POE where passengers, crew and cargo arrive from abroad to the United States or depart the United States to a foreign destination. The United States has 327 POEs (<http://www.cbp.gov/xp/cgov/toolbox/contacts/ports/>). CBP officers working for the OFO are stationed at these POEs to inspect each passenger, item and conveyance that arrives to the United States. Historically, CBP has dedicated the majority of the OFO resources to inspecting those passengers and items arriving into the United States. However, a need exists to place a greater focus on the outbound environment on the SWB.

A. AUTHORITY FOR CBP TO CONDUCT OUTBOUND OPERATIONS AT THE LAND BORDER POES

The Department of Homeland Security (DHS) has the legislative authority to perform outbound operations and interview individuals departing the United States. The Bank Secrecy Act and the Patriot Act authorize officers to question individuals departing the United States to determine if they have undeclared currency in excess of \$10,000 in currency or monetary instruments, as long as the officer could articulate a border nexus (U.S. Customs, 2000, p. 1).

Section 235 of the Immigration and Nationality Act states that an immigration officer has the authority to question persons to determine alienage and his or her right to be or remain in the United States. In addition, section 110 of the *Illegal Immigration Reform and Immigrant Responsibility Act of 1996* (IIRIRA) and the *Immigration and Naturalization Service Data Management Improvement Act of 2000* (DMIA) mandated the development and implementation of an automated entry/exit system that would record the entry and exit of every alien departing the United States. Later, Congress amended IIRIRA. Finally, section 711 of the *Implementing the Recommendations of the 9/11 Commission Act* called for a biometric entry/exit system for Visa Waiver Program travelers at all POEs.

Section 22 of United States Code, Section 401, allows for the seizure and detention of any arms or munitions and allows for the detention of any vessel, aircraft or vehicle expected of being used to export arms or munitions of war or other articles (22 USC 401). The Export Administration Regulations (EAR) is a regulation that lists commodities, specifications, and applicable license information for Commerce-controlled exports that CBP has the delegated authority to control and search for in the outbound environment. Pursuant to 22 CFR 120.1, the President is authorized to control the export and import of defense articles and defense services. That authority has been delegated to the Secretary of State, is implemented through the International Traffic in Arms Regulations ITAR, and is enforced primarily by CBP.

Title 21 Part 1300-1399 sets forth Drug Enforcement Administration (DEA) regulations for export control. It contains a list of chemicals that may be exported only under certain legitimate circumstances, such as for medical, commercial, or scientific use. The DEA regulates the movement of precursor and essential chemicals that may be used in the manufacture of controlled substances. CBP is the primary agency responsible for enforcing these regulations.

Title 31 of United States Code sections 5316, 5317 and 5332 are the provisions for the exportation of currency outside of the United States. Under 31 USC 5316, any person, or agent acting on the behalf of a person, must file a FINCEN 105 form if the intent is to export more than \$10,000 in any form of U.S. or foreign currency and other negotiable instruments. This requirement to disclose information also applies to exports that have already occurred. To ensure compliance with the requirements of Section 5316, Section 5317 authorizes stop and search at the border and without a search warrant, of any vehicle, vessel, conveyance, envelope or container or person entering or departing the United States. Section 5332 makes it illegal for any person or agent of the person to attempt to evade the currency reporting requirements, as well as making it illegal for a person knowingly to conceal more than \$10,000 and attempt to transport or transfer the currency or merchandise worth \$10,000 or more outside the United States.

Title 19 of the Code of Federal Regulations is a CBP regulation pertaining to the rules to exportation of self-propelled vehicles, vessels, and aircraft and the requirements for filing departure documents for items vehicles and conveyances and other items being exported from the United States.

19 U.S.C. § 1581(a) allows for officers to conduct warrantless searches without reasonable suspicion or probable cause on the border of any person, article or conveyance arriving into or departing from the United States.

The authorities listed above indicate that the CBP does have the authority and is actually mandated to develop and implement an outbound solution at the

air, land and sea POEs and that CBP has the right to look at vehicles and people departing the United States. Currently, no regulations are in place that require individuals or companies to transmit data on persons departing the United States via the SWB or any land border in the United States for that matter.

B. CONGRESSIONAL REPORTS RELATING TO ENTRY/EXIT PROGRAMS IMPLEMENTED BY DHS THUS FAR AT THE POES

The U.S. Visit and Immigrant Status Indicator Program (US-VISIT) was named under the Bush Administration as the program office responsible for implementing the automated biometric entry/exit program required under IIRIRA and DMIA (Seghetti, 2004, p. 1). The Congressional report on US-VISIT indicates that a significant amount of work has been done in the air environment on the entry of aliens into the United States that allows DHS to use information collected by US-VISIT as a risk assessment tool and track the entry and exit of many visitors to the United States (Seghetti, 2004, p. 23). However, the report outlines limitations of the automated system and implementation issues that US-VISIT must overcome to move forward with a robust entry/exit solution (Seghetti, 2004, pp. 23–28).

In December 2006, the United States Government Accountability Office (GAO) authored a report entitled “US-VISIT Program Faces Strategic, Operational, and Technological Challenges at Land Ports of Entry.” This report noted that the US-VISIT program could not implement a biometric solution at the land POEs without causing a major impact on the land border POEs infrastructure with major traffic jams at the border. However, a non-biometric exit system at the land border POEs does not exist that identifies who or what is departing the United States.

GAO had major concerns about DHS not possessing the capability to detect those persons who have overstayed their visas or period of admission and have not departed the United States. The report noted that some of September 11, 2001 hijackers had overstayed their visas and were not apprehended (GAO,

p. 57, 2006). In addition, if CBP is not checking those vehicles and persons departing the United States, then CBP cannot accurately track who is departing the United States. Therefore, there are two issues: 1) the inability to track overstays accurately; and 2) the inability to determine who or what is departing. Therefore, a wanted criminal or terrorist could use the vulnerability of not having an outbound policy on the SWB and go undetected by CBP.

In addition, it has been noted that the land borders are only collecting automated biometric entry information on certain individuals who require a permit to enter the United States. All other aliens entering the United States are not tracked upon departure in the land environment. The GAO states that DHS has delivered half of the automated biometric entry processing but exit capabilities do not exist (Hite, 2007, p. 1).

The reports clearly demonstrate a gap in the security of the United States by not having an exit solution in place at the POEs. The vulnerability of not being able to determine who is departing the United States is clearly articulated in these reports. The documents do outline the strength of the automated entry process and the ability to identify potential criminals and terrorists or inadmissible aliens to the United States. The reports are silent on where the money would come from to develop an exit solution or what the exit solution should look like. However, the need for an exit strategy shines through each of the Congressional reports reviewed.

C. FOREIGN GOVERNMENT PRACTICES FOR EXIT CONTROL

A body of material was found on overseas policy for entry and exit. The European Union (EU), Israel and the United Kingdom (UK) practice some form of entry and exit control for persons entering and exiting their respective regions. Two documents were reviewed from the EU entitled: "The Communication from the Commission to the European Parliament and the Council on an Entry/Exit System at the External Border of the European Union, Facilitation of Border Crossing for Bona Fide Travelers, and an Electronic Travel Authorization

System” and the “EU Schengen Catalogue.” Israeli information on entry/exit was outlined in the Department of State web pages on the entry/exit requirements, as well as an excerpt from the book entitled *Israel and the West Bank and Gaza*. The UK documents reviewed were the *UK Border Agency Business Plan*, the *UK Border Agency Standard Operating Procedures, Detention at Ports, Enforcing the Rules: A Strategy to Ensure and Enforce Compliance with Our Immigration Laws and Securing the UK Border*.

All these documents outline the processes for each country in executing some form of an entry/exit solution. However, weaknesses exist with the EU exit procedures in that some of the countries in the EU or Schengen agreements do not have the infrastructure in place to conduct outbound operations (Kindler, 2009, p. 2). In some instances, no infrastructure exists in EU countries to conduct exit inspections.

The UK literature outlined the need to align their exit procedures with those of France and Belgium with whom they have trains entering and departing to the land environment. They also outline the need for technology in the border security environment. The documentation for the UK outlined a strong perspective for border control on both entry and exit (UK, 2007, p. 17). However, many initiatives for exit control in the UK are conceptual and have not been implemented.

D. CURRENT DHS PROCESSES ON OUTBOUND ACTIVITIES

A review of the literature on outbound activities on the SWB from components under DHS reveals that its legacy agencies have been performing outbound inspections for some time (Customs, 2000, p. 12). However, the documentation is outdated and a national policy does not exist since the establishment of CBP. The legacy agencies responsible for the POEs had different responsibilities and focuses prior to the development of DHS and no national policy exists that integrates the requirements of all legacy functions into a cohesive document for an exit solution on the SWB.

In summary, the relevant sources and materials identified provide various perspectives on entry/exit solutions. However, none of the documents reviewed outline a comprehensive approach for a national outbound strategy for the United States in the land border environment. The literature outlines the absence of an outbound strategy at the air, land and sea POEs and clearly identifies the need for an outbound policy but does not identify potential solutions nor does it outline the challenges that CBP will face should a national outbound policy be developed and implemented for the SWB. Finally, this review demonstrates the weaknesses in the security of the United States in not being able to determine who or what is departing via the SWB and the consequences associated with this vulnerability.

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IV. THREATS FROM DTOS AND IMPLICATIONS FOR THE POES

In 2009, the Department of Justice declared in its annual Drug Threat Assessment that the Mexican DTOs are “the single greatest organized crime threat to the United States.” Like other criminal organizations, the Mexican DTOs are profit driven. The activities in which they are involved are mostly drug related but they do engage in other activities, such as the smuggling of humans into the United States, kidnapping, assassination and weapons and bulk cash smuggling out of the United States across the SWB. The same routes the DTOs use to move illegal aliens, narcotics and other items could be used for the entry or exit of terrorists wanted by the United States.

This section outlines some of the illegal activities in which the Mexican DTOs are involved on the SWB, as well as identify the threat that the bulk cash and weapons smuggling into Mexico causes.

A. DRUG TRAFFICKING

The SWB region of the United States, which is considered for the purposes of this thesis to be the land borders in Arizona, California, New Mexico and Texas between the United States and Mexico, represents the principal arrival zone for illicit narcotics smuggled into United States (Finklea, 2010, p. 2). More illicit drugs are seized along the SWB than in any region. CBP officers at the POEs on the SWB process arriving vehicles and persons applying for entry into the United States. They have also been successful in identifying some of the narcotics attempting to be smuggled but not all.

Mexican DTOs have developed sophisticated transportation networks extending from the SWB to all regions of the United States. They smuggle

significant quantities of illicit drugs, such as marijuana, cocaine, heroin and methamphetamines through and between the POEs along the SWB and store them in communities throughout the region.

Most of the region's principal metropolitan areas, including Dallas, El Paso, Houston, Los Angeles, Phoenix, San Antonio, and San Diego, are significant storage locations, as well as regional and national transportation and distribution centers. Mexican DTOs pay, bribe or force people, both U.S. and foreign citizens into bringing the drugs, on their person or in a conveyance, through the POEs on the SWB. The criminal groups or members of the Mexican DTOs transport drug shipments from load houses near the border area to destinations throughout the country for distribution to the American public (DOJ, 2010, p. 2). The DTOs engage street gangs to sale their product in the United States.

The following tables outline the amount of drugs seized on the SWB from 2008 through 2010. The Office of Field Operations Drug Statistics worksheet that the Office of Planning, Program Analysis and Evaluation (PPAE) provided these figures. PPAE is the office responsible for providing statistics on all OFO activities. The tables show the seizures on the SWB at the POEs only and do not account for any seizures made by the OBP in its area of responsibility.

FY 2008 Drug Weight (Pounds)				
Field Office—SWB	Marijuana	Cocaine	Heroin	Meth
EL PASO	167,570	764	3	3
LAREDO	53,451	5,945	186	211
SAN DIEGO	228,655	9,127	409	2,030
TUCSON	70,805	3,420	286	316
SWB Total	520,481	19,256	884	2,560

Table 2. FY 2008 Drug Weight (Pounds)

FY 2009 Drug Weight (Pounds)				
Field Office—SWB	Marijuana	Cocaine	Heroin	Meth
EL PASO	162,120	677	41	36
LAREDO	99,491	5,964	193	644
SAN DIEGO	279,121	8,017	617	3,648
TUCSON	105,964	3,310	190	789
SWB Total	646,696	19,968	1,041	5,060

Table 3. FY 2009 Drug Weight (Pounds)

FY 2010 Drug Weight (Pounds)				
Field Office—SWB	Marijuana	Cocaine	Heroin	Meth
EL PASO	82,831	618	58	147
LAREDO	149,933	6,068	546	685
SAN DIEGO	164,219	8,730	518	5,437
TUCSON	119,348	3,300	264	789
SWB Total	512,880	18,716	1,385	7,058

Table 4. FY 2010 Drug Weight (Pounds)

Although an estimate does not exist on how many drugs move through and between the POEs undetected by CBP, DOJ estimates that several thousand metric tons pass through the POEs based of the amount of narcotics seized in 2009 (DOJ, 2010, p. 19).

If an assumption is made that CBP only catches 25% of the narcotics that come through the POE, then the DTOs are still making more than enough money to sustain their operations and continue their illegal activities in both Mexico and the United States. For example, if the total number of marijuana seized in 2009 was 646,696 pounds and a pound of marijuana at street value is at its lowest \$2,500 dollars then CBP caught what would have been approximately \$1.6 billion that the DTOs would have profited. However, the DTOs managed to transport 1.9 billion pounds of marijuana through the POEs and the proceeds from the sale of the marijuana would be over \$4.9 billion in 2009 just for the marijuana alone.

Based off the same assumption, that CBP only catches 25% of the drugs being smuggled into the United States, using the 2010 totals and multiplying the current street value of the drugs based on the "San Diego and Imperial County Street Drugs Price List," the following are the estimated proceeds the DTOs would have made in 2010:

- 1, 538,640 pounds of marijuana X \$2500= \$3,846,600,000
- 56,148 pounds of cocaine X \$8000= \$449,184,000
- 4,155 pounds of heroin X \$8000= \$12,465
- 21,174 pounds of methamphetamine X \$15,000= 317,610,000

The fact that DTOs made over \$4 billion dollars selling drugs in the United States that went undetected and that CBP identified almost \$30 million¹ in bulk cash smuggling going south in 2010, indicates the amount of money undetected by CBP via the SWB is sufficient for the DTOs to continue to operate and thrive. To date, CBP has been unable to identify a sufficient amount of money that would cause a negative impact on the DTOs illegal activities. In addition, experts believe that the profits from the drug sales in the United States are much higher, ranging from \$13.6 to \$48.4 billion annually (Cook, 2007, p. 7).

The threat of the DTOs caused by the illicit smuggling of narcotics into the United States daily threatens the officers working at the POEs. Although CBP uses every tool in its arsenal to detect and seize narcotics being smuggled by the DTOs into the POEs, it seems that the DTOs continue to transport narcotics to the POEs to be smuggled in and CBP cannot catch it all. In addition, some smugglers have previous criminal convictions or are wanted for a crime in the United States or Mexico. Some of these people are combative when encountered by CBP or attempt to run the port, which is dangerous not only to the officers but to all the traveling public at the POE and on the streets if CBP must pursue the vehicle.

¹ Internal National Summary Report from CBP/OFO that has not been released.

B. HUMAN SMUGGLING

Since the Mexican DTOs are organized as criminal organizations, and are profit oriented, they have seen the benefits of smuggling humans into the United States using the same narcotic smuggling routes and methods. The SWB is a rich environment for those persons wishing to be smuggled into the United States.

The Mexican DTOs control the market on selling documents to those who wish to attempt to enter the United States with an altered or counterfeit document or pose as an imposter with a genuine document to gain entry into the United States. The DTOs have a sophisticated smuggling system for human smuggling on the SWB and often use foot guides to guide aliens through the POEs on the SWB. Video footage retrieved on September 1, 2010 from the San Ysidro POE revealed that two-foot guides remained in the pedestrian facility for over an hour watching the lines that the CBP officers were manning and guided the imposters to an entry lane while diverting attention from the illegal aliens attempting entry. On that instance, only two out of a possible six aliens were selected for secondary inspection. The other four made it through the POE and were on the streets of the United States.

The DTOs also engage in concealing people in trunks or non-factory compartments built into vehicles as the vehicles are attempting to enter the United States. On some occasions, the aliens are hidden in gas tank compartments welded shut and CBP must call the fire department to use the Jaws of Life or some other tool to extract the individual being smuggled safely. The DTOs have realized that human smuggling is profitable and continue to engage in this activity as another method of revenue.

In 2009, the SWB POEs have administratively processed almost 52,000 inadmissible aliens attempting to enter through the POEs.² The apprehensions on the SWB at the POEs by CBP have made the smugglers desperate to move

² Internal Workload Enforcement Statistics, 2008 and 2009.

people northbound into the United States and take drastic measures that threaten the officers and the other travelers applying for admission into the United States. For example, on September 17, 2009, the San Ysidro POE had three large vans that ran through the primary lane at a high rate of speed to attempt to bypass CBP all together. The vans did not stop at the direction of CBP and officers had to jump out of the way of the van because it was not going to stop. The vans were trying to run over the officers. The vans were unsuccessful in their attempts to run the port; however, some of the smugglers and the aliens they were trying to smuggle incurred significant injuries. Seventy-nine illegal aliens were piled in the three vans that attempted to run the port.

C. BORDER VIOLENCE

President Felipe Calderon of Mexico made it a top priority to crack down on the Mexican DTOs when he took office in December of 2006 (Biettel, 2009, p.). President Calderon sent thousands of troops and police to combat the DTOs along the SWB and within the interior of Mexico. The crackdown on the Mexican drug cartels by the President of Mexico caused the escalation of violence between several cartels for the battle to control the multi-billion dollar drug trade and smuggling corridors to the United States (Biettel, 2009, p. 3).

Although variances in the death tolls related to Mexican DTOs have occurred, deaths due to drug related violence have dramatically increased. Using the Mexican Attorney General's statistics published in April 2009, 5,600 drug-related deaths occurred in Mexico in 2008, which was a 110% increase over 2007 (Beittel, 2009, p. 9). In the first two months of 2009, the violence escalated and there were almost 1,000 drug-related deaths. Compared to the same time in 2008, this amounts to a 146% increase in drug-related killings (Beittel, 2009, p. 10).

The violence in Mexico has included assassinations of high-level government officials, federal, state and local law enforcement, military personnel and included gruesome murders and kidnappings. DEA reports indicate that the

crack down by President Calderon has led to the surge in violence by the DTOs (Beittel, 2009, p. 10). Violence is a tool of the drug trafficking industry and much of which is the result of the DTO conflict and control of territory to punish betrayals and inflict revenge on government and law enforcement successes. The DTOs also use violence to intimidate the public.

Beheading of individuals and acid washing the bodies of their victims is not uncommon for the Mexican DTOs according to intelligence sources. Videos on “YouTube” can be found that show one of the Mexican DTO groups that kidnapped a rival cartel and beheaded him with a small knife. Another video of the Mexican DTOs violence shows a young boy blindfolded in his underwear on the floor while an adult male kicks and beats him repeatedly so that he will beg his family to raise the ransom demanded by the DTO.

Border violence is an enduring threat for CBP frontline officers at the POEs and border patrol agents patrolling in between the ports. Violence directed at law enforcement officers along the SWB on the U.S. side, primarily CBP officers, often is intended to deter officers from seizing illicit drug shipments or as a diversion during drug, human or weapons smuggling operations. These incidents have increased over the past few years. For example, during FY 2008, 1,325 incidents of violence occurred at and between the POE against CBP agents and officers, a 23% increase from FY 2007 reporting.³ Ninety-seven percent (97%) of all incidents of violence against CBP agents and officers happened on the SWB. During the first quarter of FY 2009, 327 incidents of violence occurred at and between the POE against CBP agents and officers. Ninety-nine percent (99%) of all incidents of violence in the first quarter of FY 2009 occurred against CBP agents and officers on the SWB.⁴

³ Unreleased information obtained from an internal CBP BorderStat system.

⁴ Ibid.

The border violence that the Mexican DTOs participate in not only focuses on other DTOs and law enforcement officials in Mexico but Americans as well. For example, Lesley A. Enriquez, a U.S. Consular Officer and her husband, Arthur H. Redelfs, were murdered as they drove away from a birthday party in Ciudad Juarez on March 13, 2010. Both were U.S. citizens. The couple's infant daughter was found unharmed in the back seat. Mexican authorities arrested a Mexican national said to be the leader of a local street gang leader allied with the Juarez cartel (Los Angeles, July 2, 2010). He was mad because the Consular Officer issued a visa to one of the rival gang members so he murdered her. This same individual also admitted to killing 13 people in a shooting spree of a rival DTO party in January of the same year (Los Angeles, July 2, 2010).

News article after news article tell of the DTOs path of destruction on anyone who gets in their way of making money by selling drugs, or encroaching on their territory. Many of the reporters in Mexico have been threatened and many killed by the DTOs for reporting the DTO violence in Mexico and the United States. On September 17, a newspaper photographer for *El Diario de Juárez* became the 11th journalist murdered in Mexico in 2010. An unidentified man gunned down Luis Carlos Santiago Orozco in his car, and another journalist, Carlos Sánchez Colunga, was shot and sent to the hospital in critical condition. The newspaper then wrote an open letter to the DTOs asking them what role their paper should play and how they should report the news because they did not want to have any more violence or murders of the employees of the paper (Phillip, 2009, p. 1). Some journalists have turned to social media for reporting because they can remain anonymous and DTOs cannot easily find them.

In addition, the cartels post videos on You Tube that show beheadings and the beating of kidnapped victims. For example, one You Tube video in Spanish showed a DTO in black masks using a small knife to behead one of their rival DTO members. The DTOs stated this is what happened to those who interfered in their territory or their business. Another video showed a blindfolded young boy naked around the age of twelve being beaten by a man with a belt.

The attacker was also kicking the child with boots and punching the child while telling the child to plead to his parents to pay a ransom and provide information. Many photos also show the work of the cartel, such as numerous beheaded bodies hanging from bridges, people shot and killed in vehicles or their hands and face wrapped in tape with gun shot wounds that killed them with or without being tortured.

The DTOs maintain a continuing threat of violence in Mexico. The struggle to control territory and intimidate the public, government officials and law enforcement continues with no indications that the violence will decline due to the rise in deaths and border violence over the past few years. The struggle between the DTOs to control smuggling routes to the United States and the prospects of violence perpetrated by the DTOs are most likely to happen on the SWB because most of the narcotics sent to the United States by the DTOs arrive on the SWB (Finklea, 2010, p. 2). In addition, those DTO members that enter through or between the POEs become a threat to society. DTOs do participate in other illicit activities, such as smuggling people, kidnapping, extortion, and other crimes for profit. For example, kidnappings in Phoenix rose to 267 and all were drug-related (Finklea, 2010, p. 10).

D. WEAPONS TRAFFICKING

Weapons are strictly controlled in Mexico and the Mexican DTOs and their associated enforcement groups generally rely on firearms trafficking from the United States to Mexico. Mexican DTOs hire people to smuggle large and small quantities of firearms and ammunition from the United States to Mexico. The DTOs then use these weapons to defend their smuggling routes, eliminate rivals in other DTOs, control business dealings, control members, and challenge law enforcement.

Historically, illegally exported undeclared currency and weapons traveling outbound into Mexico are used by Mexican DTOs, which are responsible for a multitude of illicit activities and border violence that communities and law

enforcement face on a daily basis on the SWB (Napolitano, 2009). For example, Mexican officials have stated that the majority of the weapons that the DTOs are using come from the United States (Beittel, 2009, p. 12). Mexican officials estimate over 2,000 firearms are smuggled daily into the United States on the SWB. In addition, the ATF estimate that thousands of weapons are smuggled into Mexico every year (ATF, 2009). Many of these weapons are automatic weapons, such as AK-47 and AR-15 style assault rifles along with high caliber ammunition. In addition, some weapons seized by Mexican officials have been portable shoulder-fired anti-tank rockets and grenade launchers indicating that the DTOs have firepower to match military forces (ATF, 2009).

In January 2007, over a 15-month period, ATF determined that 23 buyers had purchased 339 firearms in one store in Houston, Texas that were mostly semi-automatic rifles. Mexican authorities also had recovered 88 of these firearms in Mexico and several of the firearms were found at various crime scenes in Mexico where police had been murdered, judicial personnel had been executed, the military had received gunfire, or a businessman had been kidnapped and murdered. Members of a DTO purchased most of these weapons. In total, 18 Mexican law enforcement officers and civilians died using firearms purchased from this U.S. gun store (Goodman, 2010, p. 2).

These weapons are arming the Mexican DTOs and are enabling them to combat local, state and federal law enforcement officers. President Calderon has urged President Obama to stop the flow of arms southbound into Mexico into the hands of the violent DTOs (Beittel, 2009, p. 12). The ability of the DTOs to have access to these weapons poses a threat to the United States. Mexico has experienced an estimated 28,000 drug-related deaths since 2006 (Finklea, 2010, p. 24). Most of these deaths involved some form of firearm. With this firepower, there is always the threat to the officers at the POEs that the DTOs are better equipped and could cause mass casualties to the officers and the traveling public if attacked.

E. BULK CASE SMUGGLING

Bulk cash smuggling into Mexico is also an increasing issue that sustains Mexican DTO's ability to continue their production and distribution of narcotics in Mexico and the United States. It also allows the DTOs to sustain or overpower local, state and federal law enforcement and military officers trying to combat the DTOs and the violence occurring in Mexico. Export regulations require persons to declare taking over \$10,000 outside of the United States on a form called "FinCen105." This form is used to track money moving into and out of the United States. The form requires the person declaring more than \$10,000 to complete biographic information on themselves and the location where the money is going to assist U.S. officials in tracking money to try to identify those who fail to pay taxes, money laundering or other nefarious activities.

As stated above, CBP is unable to determine how many narcotics and alien smuggling loads it misses at the POEs. However, using the assumption that CBP catches only 25% of what the DTOs pass through the POEs or between the POEs and using the street value of each individual narcotic and the weight, the assumption is that the DTOs are selling over \$4 billion in the United States alone. These profits are then smuggled back into Mexico.

The U.S. Patriot Act passed in 2009 made it more difficult for money laundering to take place in the United States and the DTOs resorted to smuggling bulk cash south into Mexico via the SWB. The DTOs have stash houses that bundle the money, seal it, and then hide the money in non-factory compartments, quarter panels, spare tires and other locations in the vehicles or on people that then travel from the United States into Mexico.

To weaken the DTOs, the U.S. government and Mexico must cut off this cash flow. In doing so, it will be much harder for the DTOs to bribe people and sustain their drug making business. The officers at the POE need to have the capability to detect and seize profits intended for the DTOs. To disrupt a DTO,

the government must disrupt the flow of bulk cash. The POEs have only a limited ability and tools to do so in the environment in which they are working on the SWB.

F. CORRUPTION

The Mexican DTOs also engage in the corruption of both U.S. and Mexican officials at all levels to assist in smuggling operations of both narcotics and people. The Mexican DTOs have been successful in corrupting law enforcement officials to accomplish their mission both on the Mexican and U.S. sides of the border. For example, on July 29, 2010, the Mexican military arrested 62 local and state police officers in Tijuana with ties to DTOs who also took bribes for illicit activities. Allegations that over 100 corrupt officers are on the DTO payroll or are continuing to allow DTOs to operate in Tijuana alone, is a problem throughout Mexico where the DTOs operate (Goodsen, July 30, 2010).

In addition, Mexican DTOs work at turning CBP officers at the POEs to allow them to pass narcotics or people through their lanes of traffic on the southwest border. In 2009, 19 CBP officers were arrested and convicted for performing illegal activities for gain.⁵ CBP displays these officers' pictures with the crime committed and the penalty received on the CBP internal secure website for all officers to see to dissuade other officers from becoming corrupt. However, this is a continuing threat at the POEs on the SWB.

To curb the ability of the DTOs to corrupt officials and the public on both sides of the border, the flow of bulk cash and weapons must be addressed. Without the money flow to bribe people and sustain the narcotics business, or the automatic weapons that the DTOs use to threaten people, the Mexican DTOs will be weakened and the effects of the DTOs will weaken as well.

⁵ Internal CBP website "Trust Betrayed," 2009.

G. NATIONAL STRATEGY

Currently, CBP does not have a national strategy outlining the need for outbound inspections on the SWB. The risks above highlight some of the gaps in border security based on the actions of the Mexican DTOs. To address this increasing threat on the SWB accurately, CBP management needs to develop a national strategy for combating the illicit activities and make outbound inspections on the SWB a national priority. CBP needs to identify what efforts are now occurring and their effectiveness against combating the DTOs, identify where CBP should be as an agency in terms of controlling the southbound traffic, and how to get where CBP should be to achieve the goals of strengthening the security of the United States by cutting off the flow of bulk cash and weapons currently returning to the DTOs (Bryson, 2004, pp. 6–9).

Identifying where the outbound inspection on the SWB issue falls as a national priority for CBP and DHS is important to ascertain to develop a path ahead. If an outbound policy on the SWB is a priority for CBP, specific goals and objectives should be developed to address the threats of the Mexican DTOs operating on the SWB. Specific tactics need to be identified to address how to meet the goals and objectives outlined in a strategy. Key to being successful is the communication of the priority by CBP leadership to develop an outbound policy for the SWB. Another key communication will be to reach out to the stakeholders to message the “public value” to create public interest and drive community responsibility (Bryson, 2004, p. 8). Messaging to community stakeholders and travelers will be a key component in outlining CBP’s commitment to the mission of protecting the borders of the United States while continuing to expedite legitimate trade and travel both in the inbound environment for those applying for admission to the United States and for those departing the United States into Mexico.

Once an outbound policy on the SWB is identified as a national priority and placed in the national strategy for CBP, funding must be identified for whatever policy is to be implemented. A strategic plan for an outbound policy on the SWB should outline where the agency is now in terms of mission and mandates; the current systems currently in place with the personnel working outbound; what funding has been established for outbound teams; where the agency should be regarding what policy would work best on the SWB as far as policy options are concerned, and what plans need to be developed and accomplished to reach the end state of an effective SWB outbound policy. The plan should include staffing, infrastructure, personnel, information sharing and budget needs to implement a policy and accomplish the goals of detecting bulk cash and weapons smuggling on the SWB.

Intelligence will be a key component in any plan developed for outbound inspections on the SWB. To disrupt the Mexican DTOs operating in CBP's area of responsibility, CBP needs work with other agencies to determine the most up to date and critical information on the illicit activities in which the DTOs are involved. CBP at the highest levels needs to engage outside investigatory agencies to work out agreements that outline the need for information sharing to maximize the effectiveness of identifying bulk cash and weapons smuggling into Mexico.

To be effective in the outbound environment on the SWB, CBP needs to collaborate with outside agencies and develop an overall strategy or model for information sharing that can be distributed to the field levels to increase the flow of information from investigatory agencies to CBP. For example, some outside agency cooperation and information with CBP/OFO is better in some field offices than others based on personality issues or willingness to share information. Without buy-in from the highest levels to the lowest levels on the need to share information and collaborate, CBP will not be as successful in increasing the amount of bulk cash and weapons seizures on the SWB and the DTOs will continue to thrive with their illicit drug trafficking activities and border violence.

The POEs remain vulnerable to organized and transnational criminal activity, as well as terrorist movements on the SWB. The United States has a comprehensive approach for preventing illegal contraband and aliens from entering the United States at the POEs yet little focus has been placed on who or what is departing the United States. Thus, the DTOs continue to smuggle automatic weapons and profits from their drug sales into Mexico via the southbound lanes of our POEs. A comprehensive approach must be taken to close this loophole.

In addition to the free flow of weapons and bulk cash moving south, it is a possibility that terrorists wishing to depart the United States do so via the SWB. With the limited amount of outbound infrastructure, the lack of a national strategy or national policy to conduct outbound operations, the threat of terrorists moving undetected into Mexico via the SWB is a real one.

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V. POLICY OPTIONS

A. DEFINING THE PROBLEM

The Mexican DTOs continue to smuggle undeclared weapons and currency across the SWB fueling the border violence and allowing them to sustain their drug trafficking empire. CBP does not currently have a comprehensive outbound policy in place to address this threat. In addition, no way exists to ascertain who is departing the United States on the SWB, which is an avenue for those who are in an illegal immigration status, those wanted for a crime or a terrorist plotting against the United States could depart undetected via the SWB. Some ports of entry are currently conducting sporadic outbound inspections with little infrastructure with some results. However, it is not uniform across the SWB nor is there clear guidance in place on the priority for the officers conducting the outbound inspections. What policy option or options can be put in place that will mitigate this threat of weapons and currency moving southbound into Mexico undetected?

B. POLICY OPTIONS

Several possible policy options are available for addressing this issue. They range from continuing the hit or miss status quo process of no national policy, to mirroring the inbound processing infrastructure solution for people and goods attempting to enter the United States, to a hybrid solution that would look at each site to determine the overall implementation of technology, personnel and infrastructure with intelligence sharing from internal and external agencies.

1. Policy Option A—Status Quo

This policy option would consist of continuing the current process for outbound inspections at each individual POE location on the SWB. The POEs currently performing outbound inspections on a regular basis would continue to

do so. Those POEs not currently performing outbound inspections would continue to focus on inbound traffic and not expand their outbound inspections activity.

This policy option would not require additional resources or staff outside of what is already being used to conduct outbound operations and there would be no need for additional infrastructure or technology requirements from what is already in place. Many of the POEs on the SWB do not have any infrastructure or technology and under this option, there would be no requirement to place additional items in the outbound environment. The necessity to require property rights on state and local maintained roads that lead into Mexico from the United States would not be necessary.

This policy option would not require additional training for officers at the POEs not currently performing outbound inspections and for those POEs conducting outbound operations. New officers can be trained with seasoned officers that have performed the duties of outbound inspections for vehicles and pedestrians traveling out of the United States into Mexico.

Current agreements for information sharing would continue with outside agencies for information on possible targets of those persons or vehicles that might be carrying bulk cash or weapons into Mexico. Those POEs currently conducting outbound operations would continue to work at a local level to strengthen the ability to obtain advanced information on possible targets for the outbound teams to stop and inspect prior to that vehicle or pedestrian traveling into Mexico.

2. Policy Option B—Mirror the Inbound

This policy option would be to mirror the inbound processing infrastructure and the associated personnel and technology as the outbound inspection solution. Key to mirroring an inbound inspection process in the outbound environment would be the design and implementation of the infrastructure to

accommodate facilities for primary and secondary inspections on both vehicles and pedestrians departing to Mexico. In addition, the infrastructure to interview, search and detain vehicles and cars considered potential violators or subjects of interest to CBP would be required.

At a minimum, the inbound infrastructure consists of the following for inbound processing at a non-commercial land border POE on the SWB.

- Primary vehicle lanes
- Primary pedestrian lanes
- Vehicle secondary parking area
- Vehicle secondary sitting area for passengers
- Vehicle secondary processing area for case work
- Pedestrian secondary waiting area
- Pedestrian secondary processing area for case work
- Detention cells
- Parking structure for government and personal vehicles
- Administrative offices
- Bathrooms
- Storage areas

The technology would consist of the same technology included in the primary processing lanes and the secondary processing areas and offices. For example, each primary vehicle lane would have a license plate reader, an RFID reader, a radiation portal monitor, a camera that takes a picture of the driver, a computer for the officer to view the inspection results and query manually if needed, and a document machine reader. The technology in the secondary area would include computers for the officers to run queries and stationary and mobile x-ray equipment to screen vehicles.

The secondary and administrative offices would also have to include computers, telephones, document readers, and processing space for the officers to process both vehicle and pedestrian cases. Detention cells and holding areas would also have to be included in the outbound inspection solution under this option.

To operate the outbound solution under this policy option, additional resources similar to the numbers that the POEs have for inbound processing would be necessary for this policy solution. If the POE were open 24 hours a day, seven days a week, like many of the POEs on the SWB, the amount of staff for the outbound solution would need to be the same as for inbound processing to operate all operational outbound areas.

3. Policy Option C—Hybrid

The hybrid policy option for an outbound solution would rely on some technology, some infrastructure, additional officers, in addition to developing and implementing a robust intelligence-sharing system with other federal, state and local agencies.

This approach would take the limitations of each SWB POE and determine how much infrastructure; technology and officers could be placed in the environment to maximize the effectiveness of recording vehicles and people departing the United States into Mexico and assist in identifying persons attempting to smuggle bulk cash and weapons into Mexico. The POE could determine the hours of operation for outbound inspections and could run 24 hours or day, pulse and surge operations or for threat-based targets received from internal or external partners, or all three options in the hybrid policy option.

The technology that would be put into place for the vehicle inspections would be contingent on the individual site but could consist of license plate readers on gantries that would capture vehicle license plates. The gantries should be strategically placed so that the information is collected in advance of

the CBP officer and can be sent to the CBP system that the CBP officers could monitor prior to the car reaching the inspection site. RFID technology similar to that in the inbound processing lanes could be placed if space permitted in addition to a camera that took a picture of the person in the vehicle.

If there is space for a vehicle secondary area then mobile or stationary X-Ray equipment could be used on the vehicle to detect any anomalies in the vehicle that indicate a potential for hidden bulk cash or weapons. Scopes for inspections on the vehicles, as well as busters to determine depth discrepancies, could also be used as tools for the officers to use in the secondary environment. Computers should be placed in the secondary area for case processing and in-depth queries of the vehicles and people being questioned.

The pedestrian infrastructure for the hybrid policy option would be again dependant on the space available at the POE and ability to expand. If some space were available, a pedestrian processing center or pedestrian lanes for officers to check documents and questions pedestrians on what they are exporting into Mexico could be built. Name queries could be done to maximize the ability for CBP to identify wanted or endangered persons, terrorists, previous violators of United States law or those persons attempting to smuggle bulk cash and weapons out of the United States. A secondary office with holding facilities and case processing and interview areas should also be included in the pedestrian work area to perform secondary inspections on cases referred from the primary inspection lanes.

The technology for the pedestrian processing would consist of some computers, RFID readers, document machine readers, x-ray equipment for personal belongings, turnstiles for the pedestrians to pass through. The amount of equipment would be assessed during the site survey for each individual POE. Some technology, either mobile or stationary, is needed in the pedestrian environment to maximize the capability to identify possible threats exiting the United States.

To conduct the outbound inspections, each POE would require additional officers to staff the facility and conduct outbound inspections. The size of the facility built, the hours of operation and the technology deployed would determine the number of officers needed. The additional officers should be seasoned officers from either inbound processing or those currently working at a POE that conducts outbound inspections, but new officers should be hired for the inbound processing so as not to deplete the inbound processing staff. An assessment should be done to determine staffing needs for outbound similar to how it is done for inbound processing. Current staffing numbers for inbound processing should not sustain outbound operations. Outbound should be a priority with its own staffing model.

Information sharing is critical in this policy option. CBP needs to work with federal, state and local law enforcement partners to identify potential targets that are likely to smuggle bulk cash and weapons south. For example, ATF has information on weapons being bought from local gun stores and could provide names and license plates to CBP to target those persons and vehicles if encountered traveling south through a POE possessing outbound processing capabilities. DEA could provide information on vehicles known to have traveled from the interior of the United States with bulk cash and are believed to be headed south into Mexico. With these targets, CBP can stop these vehicles if encountered and seize more money and weapons that would have gone into the hands of the DTOs. The information circle could then be closed by providing that information back to ATF and DEA on the targets that they provided. Working together in law enforcement with sustained enforcement and information-sharing efforts will prove fruitful, and at a minimum, shut off some of the flow of weapons and bulk cash returning to the DTOs.

Each POE would be assessed in the outbound environment to determine the capability and need for the following.

- Infrastructure
- Technology
- Officers

However, intelligence sharing both internally and externally would need to happen no matter how much technology, infrastructure or people are put into place to truly be effective in the outbound environment. The drive for intelligence sharing would have to come from the highest levels of DHS and CBP, and the other federal, state and local agencies.

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VI. POLICY OPTIONS ANALYSIS

The Lincoln-Juarez Bridge POE in Laredo, Texas and the San Ysidro POE in San Ysidro, California are two POEs that currently conduct outbound operations. Both locations have dedicated outbound teams and work pulse and surge operations, which means they work at different times and days of the week and neither are a 24/7 operation. Each POE has different infrastructures for the outbound inspections yet each have encountered bulk cash and weapons smuggling into Mexico.

This analysis examines each location and analyzes how each policy option would improve the ability to detect bulk cash and weapons, how easy the option would be to implement at each location, the cost and how well the flow of traffic would be if each policy were implemented in each environment.

A. LINCOLN-JUAREZ BRIDGE POE

The Lincoln-Juarez Bridge is a target-rich environment because it is geographically desirable for bulk cash smuggling from the United States into Mexico. The POE is nestled at the end of U.S. Interstate highway 35, which runs north straight into Chicago. Every major Interstate highway running east to west intersects with I-35.



Figure 1. Lincoln-Juarez Outbound Inspections

1. Policy Option A—Status Quo

The city of Laredo owns the Lincoln-Juarez Bridge on which the POE is located for southbound traffic. Each vehicle entering Mexico must pay a toll. The street leading up to the outbound lanes is a city street with traffic lights on every block and signs that indicate federal officers are working.

Currently, the Lincoln-Juarez Bridge has four outbound processing lanes. The lanes do not have booths for officers to stand in or technology to query vehicles or the people in the vehicle. License plate readers query the vehicle license plates and this information is transmitted to a computer in the secondary office area. If a vehicle is stolen, the officer in the secondary area can radio to the officers out on the lane or call out to them to stop the vehicle prior to it entering the toll plaza to pay the toll. A canopy covers the entire outbound inspection area. The POE has a small secondary office for searching and interviewing subjects referred from the primary vehicle lane and technology to query names of people and license plates.

One of the lanes can be blocked to use as a secondary area for searching vehicles or using the mobile X-ray van to screen the car to determine if any items are hidden in the vehicle. The x-ray van will show anomalies if there is a non-factory built compartment, or anomalies throughout the vehicle. For example, some bulk cash smugglers use non-factory compartments to hide cash they are attempting to smuggle or spare tires or other parts of the vehicle hide the cash that cannot be detected by the naked eye. The port also has stationary x-ray equipment for x-raying personal belongings in the vehicle or on a person.

The outbound team at the Lincoln-Juarez Bridge POE is led by a CBP, one supervisor, 14 CBP officers, two canine officers, one border patrol supervisor and 10 border patrol agents. The team works varying shifts to remain unpredictable. ICE also works on occasions with the outbound team to conduct inspections and to provide target information on those suspected of smuggling weapons and/or bulk cash into Mexico.

The outbound team was provided targets for potential smugglers of bulk cash and weapons by ICE in 2009, which was very successful. For example, in 2009, the outbound team in Laredo intercepted over \$13 million in bulk cash attempting to be smuggled into Mexico. The team was also responsible for 11 weapons seizures and thousands of rounds of ammunition prior to entry into Mexico. In 2010, the team had 12 weapons seizures with thousands of rounds of ammunition and seized over \$5 million dollars in bulk cash attempting to go undeclared into Mexico.⁶

Laredo management has made an effort to develop and train a dedicated outbound team to conduct inspections on the southbound lanes leading into Mexico. In doing so, the team has been the most successful of all of the SWB land POEs within CBP. The team has established procedures for targeting vehicles and people, and has been successful in finding some bulk cash and weapons in secondary interviews and searches of vehicles. The team has

⁶ Seizure data from the Office of Policy, Planning and Evaluation within CBP from a local database not released in a public document.

worked with ICE to obtain intelligence on potential bulk cash and weapons smugglers but that free flow of information has not been sustained throughout 2010.

Under this policy option no changes to the current outbound team's operations in Laredo would occur. No additional costs would be incurred by the port and no additional officers would be required. Intelligence gathering with outside agencies could be ongoing under this initiative to maximize productivity. The flow of traffic would be dependent on how often outbound inspections were initiated but the impact on traffic flowing into Mexico would be minimal. The wait time currently in the status quo is less than five minutes on average. However, the difference in the amount of bulk cash seized in 2009 has declined more than 50% in 2010 when continuing with this model.

2. Policy Option B—Mirror Inbound

The Lincoln-Juarez Bridge is a 24/7 POE that processes privately owned vehicles only and does not process commercial or pedestrian traffic. The POE has 12 inbound lanes for processing vehicles attempting entry into the United States and a canopy covers all 12 lanes of traffic. Each lane is equipped with a booth where the officer stands to inspect the traffic. The Lincoln-Juarez Bridge does not process pedestrian traffic.

There are 32 vehicle secondary parking spaces and a secondary office to perform secondary cases for those inadmissible to the United States are smuggling narcotics or other prohibited items or who require a permit to enter the United States, all of which would have to be replicated in the outbound environment.

Technology would also have to be implemented in the outbound environment to mirror the inbound infrastructure and processing. The inbound vehicle lanes are currently equipped with license plate readers for reading the front and rear license plates, RFID readers for RDIF-enabled documents, such as passport

cards or border crossing cards, scene cameras that capture the vehicle and the driver, and the radiation portal monitors. All of the underground wiring and electrical requirements would also have to be installed or extended to the outbound environment for this technology to work.

The booth in which the officer stands also contains technology to perform inspections. A computer containing all hit information is used along with a machine-readable zone scanner to query machine-readable documents not RFID enabled or is utilized for manual queries of CBP systems. Primary inspection booths also have phones that connect to the operations center and a port runner system to alert officers when a port runs through the booth without inspection.

The secondary inspection area in Laredo for inbound processing currently has technology for the officers to use to perform secondary inspections, such as computers for querying vehicle, person and crossing history, as well as criminal history. In addition, x-ray equipment, busters that measure density, fiber optic scopes for looking into gas tanks and other spaces not easily reached and visible are employed.

The "U.S. Land Port of Entry Design Supplement Guide." authored by CBP. outlines the minimum requirements for the inbound physical infrastructure. At a minimum, the infrastructure that Laredo would need to implement in the outbound environment to mirror the inbound infrastructure would be the following.

- 1 Main Building for officers and administrative personnel
- 12 Primary Inspection Lanes
- 12 Primary Booths
- 1 Management Operation Center
- 32 Secondary Inspection Bays/Parking spaces
- 1 Secondary Building
- 1 Enclosed Secondary
- 1 Vehicle Lift
- 2 Secondary Booths
- 1 Short Stay Dog Kennel w/ individual kennels

- 1 Impoundment Lot for seized vehicles
- Parking Structure
- 2 Vaults for seized narcotics, money, merchandise and other articles

Construction costs and costs to implement technology vary from state to state and by company. In addition, the landscape and environmental impacts vary from location to location. However, the costs of a fully equipped vehicle inspection lane are known to CBP, and can be used to demonstrate one portion of the costs and can be compared throughout the three policy options.

A new fully equipped vehicle inspection lane costs \$175,000 if more than four lanes are being put into a POE.⁷ The booth costs an additional \$100,000. Thus, the total costs for one booth is \$275,000.⁸ For Laredo to put in 12 new lanes, the costs for the lanes alone would be \$3.3 million dollars.

To operate in the outbound environment on a 24/7 basis, additional officers would have to be hired to conduct the outbound inspections. Generally, outbound inspections are conducted by seasoned CBP officers, who are now currently at the General Scale 12 (GS-12) while supervisors are at the General Scale 13 level (GS-13). The costs for CBP to maintain a GS-12 on a yearly basis with the salary, benefits and support is approximately \$161,645⁹ and the costs to maintain a GS-13 supervisor in the same manner is \$182,871 per year.¹⁰ Although CBP will not release staffing numbers by location, it is estimated that 45 people work each shift at the Lincoln-Juarez Bridge and a minimum of three shifts cover the 24/7 operating hours. At a minimum, the total number of officers that would have to be assigned to the outbound inspection facility that mirrors

⁷ CBP estimate for a vehicle lane with the Western Hemisphere Travel Initiative technology installed to include front and back license plate reader, two cameras, RFID reader, computer, machine readable zone scanner, and telephone outlet. The costs come from an unreleased internal document.

⁸ Ibid.

⁹ Staffing costs internal to DHS, which include salary, benefits and support.

¹⁰ Ibid.

inbound would be 135, of which 130 would be at the GS-12 level and five at the GS-13 level to supervise operations. Based on the costs listed above, the GS-12 cost per year would be \$21,013,850 and the GS-13 salaries would be \$914,355 for a total of \$21,928,205 per year.

A robust public outreach campaign to notify the public of the changes for vehicles traveling into Mexico would be required to transition from a pulse and surge operation with sporadic inspections with minimal staff into a full time outbound solution that mirrors inbound. Newspaper, radio and television ads would need to appear in both English and Spanish to notify the traveling public of the changes. Similar changes in processing and procedures occurred with the implementation of the Western Hemisphere Travel Initiative (WHTI) and the outreach campaign for outbound would need to be similar to that campaign. WHTI spent \$5.5 million for one year for outreach¹¹ for the nation focusing on northern and southern land border areas. For the Lincoln-Juarez Bridge, the amount will be cut in half for cost estimating purposes since the Lincoln-Juarez Bridge is on the SWB; therefore, the costs of outreach would be approximately \$2.75 million.

The costs to mirror the inbound inspections in the outbound environment at the Lincoln-Juarez Bridge for the purposes of comparison would be \$27,978,205.¹² This figure is not meant to be all encompassing since the true costs to mirror the inbound inspection in the outbound environment would be much higher because CBP would have to hire a contractor to develop and design the outbound inspection area, build each building that the inbound environment has, run cable and wiring for the technology, buy the equipment, do environmental assessments, and purchase the property rights and the property. However, it does provide a cost for this thesis to compare.

¹¹ WHTI outreach cost spreadsheet.

¹² \$21,928,205 for staffing plus \$3,300,000 for lanes plus \$2,750,000 for outreach=\$27,978,205.

In looking at this policy option, there are both pros and cons to implementation. The costs identified in this thesis are partial costs only and real costs for any location would still have to be identified. However, if implemented, CBP would benefit because each vehicle traveling through the southbound lanes of the Lincoln-Juarez Bridge could be examined and a determination made as to whether a secondary inspection was warranted.

Based on referral rates of the inbound processing, less than 2% of the total inbound traffic is referred for secondary inspection. Statistical data from the Laredo Bridge System states that 3,381,080 vehicles departed through the Lincoln-Juarez Bridge in 2009.¹³ Using the same referral rate from inbound processing in the outbound environment would mean that 67,621 cars would be referred for secondary inspection annually, 5,635 monthly and 187 cars daily. Of the 187 cars referred, less than one car every two days would be likely contain have undeclared bulk cash or weapons. It is impossible to determine the amount of bulk cash and weapons that CBP would seize. However, an assumption can be made that CBP would be more successful than in 2010 and would increase by 100% in the amount of money and weapons found under this solution. In this instance, the amount of cash seized would be \$10 million and the number of weapon seizures would increase from 12 to 24.

The city streets leading up to the Lincoln-Juarez Bridge would be backed up for miles and not only affect the city traffic but the traffic on Interstate 35, which is a major interstate that runs throughout Texas. The public perception of waiting in this traffic would be negative and the city businesses in Laredo would also probably complain that business would decrease if this option were to be implemented due to congestion and the inability for vehicles and people to move freely through Laredo to visit local businesses and south into Mexico after shopping or visiting Laredo. For this policy option, the free flow of traffic would be very low due to the congestion that the new outbound inspection would cause if

¹³ City of Laredo, Laredo Bridge System, Statistical Data-Fiscal Year 2009, Traffic Distribution Worksheet.

implemented. It is also likely that travelers would divert to other bridges in the Laredo area to depart the United States into Mexico. It is anticipated that wait times for the Lincoln-Juarez Bridge would rise to over 60 minutes if implemented similar to that of the inbound traffic but with added time due to the fact that cars proceed through a toll booth and pay a toll prior to entering into Mexico.

The ability to buy the rights to any additional land to build an outbound inspection would have to be requested from the City of Laredo because they own the property rights and the bridges in Laredo that lead into Mexico. It is unlikely that the City of Laredo would be willing to sale any property rights or land for CBP to construct an outbound inspection area mirroring the inbound. In addition, it would be very difficult to expand the bridges and roadway approaching the southbound lanes into Mexico because of the close proximity of residential subdivisions and not very much land exists in between.

The funding for a new outbound facility that mirrors the inbound inspection for the Lincoln-Juarez Bridge currently not appear in any upcoming budget cycles. CBP would have to develop budget estimates and costs and develop a budget proposal for the FY12 or later budget cycle for Congress to appropriate funding for this facility upgrade and all costs associated with development of outbound processing that mirrors the inbound processing.

The time it would take to implement this policy option would be dependent upon securing funding, the hiring, training, or moving people to work at the port and the time it takes to acquire and build the facility assuming that the land could be purchased. Also considered is the time it takes to develop and secure the budget, as well the time needed for development and implementation. In this case, it does not look feasible; thus, the ease of implementation for this policy option is very difficult.

3. Policy Option C—Hybrid Solution

The hybrid solution for the Lincoln-Juarez Bridge would consist of a site visit to determine what, if any, infrastructure is needed in the southbound lanes into Mexico, what technology is currently available and what can be bought and implemented within the footprint of the southbound environment. Also, it is necessary to know how many people would be required in addition to who is already available. Also important is an agreement with internal and external stakeholders on information and intelligence sharing to develop actionable targets for bulk cash and weapons smuggling into Mexico.

A full site survey should be completed at each location to realize what can and cannot be done in the current environment and landscape at each POE. It may be possible to obtain property rights in some locations and southbound operations extended to develop and deploy some infrastructure, technology and personnel while working on the relationships to build the information and intelligence sharing information between agencies.

The Lincoln- Juarez Bridge has four outbound lanes that lead into several toll booth lanes to depart the United States into Mexico. A canopy covers all the lanes and an office currently is used to monitor one computer in the secondary environment. These lanes are currently not equipped with valuable technology that would assist the officers in detecting potential targets. A stationary x-ray machine is used to x-ray personal belongings and the POE also has a mobile x-ray van for vehicles if space is available.

In the hybrid solution, the four lanes would be re-built to have a fully functional vehicle lane that costs \$275,000. These lanes would have the same equipment in them as previously mentioned in Policy Option B. The total costs for these four lanes would be \$1,100,000. The current secondary office would also be upgraded to include more computers and secondary processing equipment, which will not be included in the cost estimate for this thesis.

The outbound team at the Lincoln-Juarez Bridge POE has one CBP/OFO supervisor, 14 CBP officers, two canine officers, one border patrol supervisor and 10 border patrol agents. The team works varying shifts and days off to remain unpredictable. The team is able to cover about two shifts but often works other bridges. In the hybrid policy option, the recommendation would be to augment the current staffing levels and place an additional 14 CBP officers at the GS-12 level and two supervisors at the GS-13 level and create three shifts to cover a 24-hour period or pulse and surge operations working overlapping shifts based on target and threat information.

The costs of the additional personnel for the 14 GS-12 officers would be \$2,263,030. The costs for the two GS-13 supervisors would be \$365,742 for a total of \$2,628,772 for personnel for the hybrid solution.

The team currently works outbound operations but with the implementation of new technology, people and equipment, a campaign outlining the fact that upgrades to the outbound processing are being improved would be recommended. The amount of outreach would not have to be as extensive as mirroring the inbound solution and could be a third of the cost. Thus, the cost of the outreach campaign to notify the public would be \$916,666.¹⁴

In this option, intelligence would be a key factor. The more intelligence sharing between CBP and other federal, state and local entities, the more successful CBP will be in identifying bulk cash and weapons smuggling out of the United States. Assuming that the Department of Homeland Security at the highest levels has worked internally to mandate that our own investigatory agency, as well as other federal agencies, share target information with CBP on people and vehicles known or suspected of being involved in bulk cash or weapons smuggling, then the amount of interceptions would increase. CBP could work locally with state and local law enforcement entities to receive target information on those known to local law enforcement.

¹⁴ \$2,750,000 for Policy Option B was divided by 3 to get 916,666. This was done because there were 12 lanes in Option B and only four in Option C so 12 lanes divided by 4 lanes = 3.

This solution has pros and cons as well. With this option, it is not possible to inspect each vehicle exiting into Mexico. However, the ability would exist to capture all of the license plates departing the United States electronically for future targeting purposes. Officers would still not be able to cover 24/7 operations due to days off and annual and sick leave. However, the teams could cover two shifts a day five times a week.

Statistics on how many more targets is difficult to estimate. However, the amount of seizures and money decreased by 50% when the amount of intelligence given by other federal, state and local agencies halted. Thus, for the purposes of this thesis, the assumption will be made that if a robust intelligence-gathering model is put into place, then the number of seizures and/or amount of money seized will increase by 50 percent. For example, in 2009, the Lincoln-Juarez Bridge seized approximately \$5,000,000. Under the hybrid solution, once the intelligence-sharing module was implemented, an increase of \$2,500,000 would be expected the following year for a total of \$7,500,000. The amount of weapons would also increase based on intelligence by offices, such as ICE and ATF.

The ease of implementation would not be that difficult because the solution is using infrastructure already in place. Therefore, property rights would not have to be addressed since CBP already owns or leases this area and works there year round. In addition, the flow of traffic would be minimally impacted. Currently officers stand on four lanes and ask questions to the traveling public. This option would have minimal impact and only cause minimal delays at peak traffic times; therefore, the public perception of this option should be medium to high since the solution would minimize the impact on traffic flow onto the bridge into Mexico. The time it would take to implement this option would be the amount of time to secure the funding and hire or move people to Laredo. The total costs for this option based on the same criteria used in the other options would be \$4,645,438.

B. SAN YSIDRO POE

The San Ysidro POE is located in San Ysidro, California and runs northbound into Interstate 805 or Interstate 5. For those traveling south into Mexico in a vehicle, Interstate 5 leads into Mexico. San Ysidro is desirable to bulk cash and weapons smugglers into Mexico because of the sheer volume of vehicles traveling out of the United States into Mexico and since it is located on a busy interstate with speeds reaching 75 miles per hour. In addition, CBP seizes thousands of pounds of narcotics each year at the San Ysidro POE.



Figure 2. San Ysidro Outbound Operations

1. Policy Option A—Status Quo

San Ysidro POE processes both vehicles and pedestrians departing the United States into Mexico. A sidewalk that leads directly to the turnstile to enter Mexico is to be inspected by Mexican officials. There is no facility or infrastructure for CBP to stand in for the pedestrian inspections and no secondary area exists for processing those who are believed to have violated federal or state law. Officers stand on the sidewalk, inspect the pedestrians and

ask for declarations of what they are exporting into Mexico if anything. They also ask the pedestrians if they are carrying over \$10,000 in currency or merchandise into Mexico.

Officers at the San Ysidro POE also conduct vehicles inspections on Interstate 5. Officers must set up the freeway with CBP vehicles to block some of the lanes so the traffic is funneled from six lanes down to three so that the traffic will slow down. Officer safety is a critical element in this environment since the cars can travel over 75 miles per hour making this a very dangerous situation for the officers. Cement blocks called K-rails divide the lanes at one point of the freeway to assist the officers in slowing down traffic with the vehicles and some antiquated license plate readers read the plates on the vehicles. The information is transmitted to a computer at the U-turn, which is far from the initial inspection of the vehicles. There is no booth for the officer to stand in to be protected or shielded from the vehicles.

The officers pull the vehicles over to the side of the freeway where the cars are blocking the lanes to inspect the vehicle and the drivers more thoroughly. No real secondary area exists but the officers have the cars to the side of the freeway and they use busters to look for anomalies in the vehicle structure. At the same time, they are questioning the occupants to determine if something is concealed in the vehicle or on the person. Although there is not much space to inspect the vehicles, the team has tried to use the mobile x-ray equipment to inspect some of the vehicles referred to secondary. In addition, operations have occurred in which mobile x-ray has been used for pedestrian's belongings.

If a pedestrian or a vehicle is believed to be involved in illegal activity, the officers must transport the person and/or the vehicle back to the POE. The outbound team does not currently have transport vehicles so it walks the pedestrians and people traveling in the vehicles and drives the vehicle back to

the vehicle secondary area to conduct x-rays and inspections. The pedestrians, drivers or passengers are taken to the security officer for an immediate pat down for officer safety and are then interviewed.

The San Ysidro POE has a team of 22 officers and two supervisors that currently work the outbound environment. The teams cover two shifts about five or six days a week depending on the days off and shifts of the team. The teams currently work pulse and surge operations and try and stay unpredictable to maximize effectiveness. The 6-lane interstate makes the outbound team's job very difficult and dangerous due to the high rate of speed and the number of cars departing the United States into Mexico.

On occasions, ICE agents will work with the outbound team but little information is shared with CBP in San Ysidro. However, when information is shared, the results are good. For example, ICE received data from an external law enforcement agency that a vehicle had concealed high-powered weapons in it and they provided that information to CBP. The outbound team was able to get on the freeway and stop the vehicle. Eight automatic weapons with ammunition were seized that were bound for Mexico and most likely DTOs.

In 2009, the San Ysidro outbound team seized approximately \$1,300,000 and had one weapon seizure during the 2010 timeframe.¹⁵ The team continues to work in both the pedestrian and vehicle environments to maximize the ability to detect and stop potential bulk cash and weapons smugglers. The outbound team also looks for those wanted for crimes in the United States to stop those wanted persons from exiting the United States into Mexico.

Management at the San Ysidro POE has taken officers from the inbound processing and placed them in the outbound environment in an attempt to identify bulk cash and weapons being smuggled into Mexico. The team has been given some training to maximize their effectiveness. However, the conditions are

¹⁵ Stats from the Office of Policy, Planning, and Evaluation within CBP ran through a local system and not released publicly.

dangerous with the set up on an Interstate that allows speeds of over 75 miles per hour. The team has been successful in seizing some bulk cash and weapons, as well as in identifying stolen vehicles and those persons wanted for a crime by other federal, state and local agencies.

Under this policy option, no additional costs would be incurred to continue outbound inspections in the manner currently being done. The flow of traffic will depend on how often inspections are conducted and certain times of the day that traffic is backed up even if the outbound team is not on the freeway. Pedestrian traffic is not really affected by outbound processing by CBP. The number of seizures will continue to improve as the team obtains better information from ICE or external agencies and as the targeting for outbound improves.

2. Policy Option B—Mirror Inbound Processing

The San Ysidro POE is a 24/7 POE that processes non-commercial vehicles and pedestrians making entry into the United States. The San Ysidro POE has 24 vehicle lanes of traffic with booths in each lane. The pedestrian facility has 13 working pedestrian lanes and a pedestrian. The vehicle secondary has over 60-vehicle secondary parking bays and has a security office for the people with cell phones and three super booths for officers to run queries in for the vehicles and their owners. The pedestrians have a secondary area to screen those referred. There is an immigration processing area for both pedestrians and vehicles for those considered inadmissible to the United States

The inbound vehicle lanes are currently equipped with license plate readers for reading the front and rear license plates, RFID readers for RDIF enabled documents, such as passport cards or border crossing cards, scene cameras that capture the vehicle and the driver, and the radiation portal monitors. All of the underground wiring and electrical requirements would also have to be installed or extended to the outbound environment to make this technology work.

The booth that the officer stands in also has technology to perform inspections. A computer containing all hit information is used along with a machine-readable zone scanner to query machine-readable documents not RFID enabled or is utilized for manual queries of CBP systems. Primary inspection booths also have phones that connect to the operations center and a port runner system to alert officers when a port runs through the booth without inspection. All of this would need to be replicated in the four outbound environment.

San Ysidro would need to purchase the property rights to the land adjacent to the POE and build 24 vehicle lanes fully equipped with the same technology that the inbound lanes have. The cost of a lane with the technology in place is approximately \$275,000 per lane. The cost for the lanes would be \$6,600,000 using the same information used in the Laredo example. These costs do not include the pedestrian costs for lanes. For the purposes of this thesis, the costs used for the lanes will only include the vehicles lanes for comparison. Other costs are associated with the infrastructure of mirroring the inbound and these estimates are only used for comparison costs between the policy options.

The number of officers working at the San Ysidro POE to cover a 24/7 period at the officer level is 560 officers and there are 65 first line supervisors. In order to replicate staffing levels in the outbound environment, the GS-12 officer level would cost \$ 50,521,200. The GS-13 level supervisory costs would be \$11,886,615 for a total of 62,407,815 annually for outbound operations mirroring the inbound operations.

Outreach to notify the public would need to occur to ensure awareness of the new processes and procedures to be implemented. As stated in the Laredo example, the number for the SWB would be \$2.75 million just for costs estimates. Therefore, the total for the San Ysidro POE to mirror the inbound processing would be \$71,757,815. The recurring officer costs would continue and operations and maintenance costs for the lanes and technology would recur.

The number of cars that entered the San Ysidro POE in 2009 was approximately 13.5 million vehicles. Of those cars, less than 2% are referred to secondary inspection. Based off the Laredo figure that 72% of the inbound traffic coming into the United States left through the Lincoln-Juarez Bridge, the same percentage used in San Ysidro would mean that 9,720,000 would be departing into Mexico via the San Ysidro POE. Thus, 194,400 cars would be referred to secondary in the outbound environment annually, while 16,200 cars would be referred monthly or roughly 540 a day, and most for administrative purposes. In this policy option, an assumption could be made that a 100% increase would occur in what CBP identified in the outbound operations. Thus, the CBP outbound team under this option would seize \$2,600,000 and make more than two weapons seizures.

This policy option would allow CBP to look at each car and possibly talk to each person departing the United States. The information from the technology in place would benefit CBP in determining what vehicles are exiting the United States and potentially what people are departing the United States. The more cars and people examined would cause one to think that more apprehensions and seizures would be made.

However, the implementation of 24 vehicles lanes of traffic would back up traffic for miles both on Interstates 5 and 805 for those cars merging into the five lanes to enter Mexico. The public would notice a difference in the traffic wait times. Inbound wait times on the 24 lanes of traffic vary from 20 minutes at low times and almost two hours at peak times whereas now the wait times are minimal.

San Ysidro is currently under going construction and has already purchased some of the land to extend the POE to conduct outbound operations. However, under this policy option, CBP would have to purchase additional land, which may not be available. The time it would take to implement this option would be dependent upon securing funding, hiring, training, or moving people to work at the port and the time it takes to acquire and build the facility assuming

that the land could be purchased. Based on the time it takes to develop and secure the budget, and the time for development and implementation, the ease of implementation for this policy option is very difficult.

3. Policy Option C—Hybrid Solution

The hybrid solution for the San Ysidro POE would consist of a site visit to determine what if any infrastructure exists in the outbound lanes leading into Mexico, what technology exists and what can be bought, updated or built within the footprint of available space. In addition, an assessment of how many people would be needed would have to be determined and recommended to establish a robust outbound inspections process. An evaluation of the intelligence sharing between CBP and other federal, state and local law enforcement entities should also be accomplished to build a foundation for sharing actionable intelligence for CBP to act upon in the outbound environment to be effective. A team should conduct a full site survey to identify what can and cannot be done in the San Ysidro environment since it is on a very busy interstate and there is limited space to work with in the southbound environment.

The San Ysidro POE has six southbound lanes that go into Mexico. There are cement barriers that run separate from the lanes at one point in the freeway so that the officers have some cover and to slow down traffic. These lanes do not possess technology for the officers to use to alert them that a potential target exists to whom they are talking. Any information would be gathered from the old license plate readers. The information from these readers goes into the U-turn booth located far away from the inspection site and the officers depend on radio communication to alert them of a computer-generated hit on a vehicle.

In the pedestrian environment, no infrastructure exists at all to slow people down or to query their documents and/or names and dates of birth. There is no canopy over the sidewalk leading into Mexico where the pedestrians walk, and neither is there one for the vehicles lanes of traffic.

The San Ysidro POE does not have any space dedicated to secondary referrals. In fact, the team places cars in the far left lanes to use in processing vehicles pulled over for additional questioning. A vehicle secondary area would be needed for the officers to refer vehicles to for inspection with or without x-ray equipment. Both primary and secondary pedestrian facilities would need to be built and technology installed to inspect individuals departing the United States into Mexico properly.

In this solution, the six lanes currently on Interstate 5 for traffic would be built to include all the technology available in the vehicle primary booth. These lanes would be equipped with the same equipment as mentioned in Policy option B and the price is the same per lane at \$275,000. The license plate readers could be placed in a location to query as soon as the car is in the lane and the officer would have that information waiting at a booth prior to the arrival of the vehicle. The costs for the lanes would be \$1,650,000. This number does not account for any of the pedestrian facilities or secondary processing facilities or equipment needed to accomplish a hybrid approach. However, it is an equal comparison using the lane cost only.

Currently, two teams work outbound inspections with 22 officers and two supervisors. The teams usually work different shifts but can only cover one area, either vehicle or pedestrian, since the freeway is dangerous with little to no infrastructure. To support a 24/7 operation in the vehicle and pedestrian environments for outbound operations, an additional 66 officers¹⁶ at the GS-12 level and an additional six supervisors at the GS-13 level would be required. The costs for personnel to accommodate the hybrid solution would be \$10,668,570 for the GS-12 personnel and \$1,097,226 for the GS-13 supervisors for a total of \$11,765,796 annually. The personnel should be brought from the outside, or at a minimum, if taken from inbound processing, those officers should be backfilled.

¹⁶ Twenty-two officers on each shift to cover two additional shifts and days off for 24/7 coverage.

To move to a more robust outbound inspection process, CBP would need to educate the public on the new process. CBP would also need to deploy signs in English and Spanish to inform the public that are officers working outbound so that cars would slow down. As previously stated, WHTI launched a similar outreach campaign to the public that required \$5.5 million for advertising and informing the public that new procedures were in place for both the SWB and the northern border, the costs for the SWB would be \$2.75 million. Using the same formula used for Laredo, this number would be divided by 2 since there are six lanes proposed in the hybrid solution. Thus, the costs for outreach for the San Ysidro area would be \$1,375,000.

In this option, intelligence would be a key factor. The more intelligence sharing between CBP and other federal, state and local entities, the more successful CBP will be in identifying bulk cash and weapons smuggling out of the United States. Assuming that the Department of Homeland Security at the highest levels has worked internally to mandate that our own investigatory agency, as well as other federal agencies, share target information with CBP on people and vehicles known or suspected of being involved in bulk cash or weapons smuggling, then the amount of interceptions would increase. CBP could work locally with state and local law enforcement entities to receive target information on those known to local law enforcement. Historically, intelligence information sharing from outside entities has been limited.

In this option, officers could use the technology and target those who they wanted to stop and question or they could stop and speak with each vehicle attempting to depart the United States. The same is true for the pedestrian environment. The technology that would be installed would capture license plate data whether the officer chose to speak to the person in the vehicle or not and would provide CBP with critical data for intelligence purposes.

Statistics are difficult to predict. However, with this solution, the officers would be looking at more people and obtaining more advance information. Thus, an assumption could be made that seizures would increase 50% annually. San

Ysidro seized almost \$2 million dollars from 166 different seizures in FY10.¹⁷ Consequently, using the assumption that a 50% increase would occur means there would be 332 seizures and almost \$3 million in bulk currency. In FY10, there were two weapons seizures. Therefore, there would be at least three weapons seizures and the numbers would grow with the intelligence-sharing protocols put into place.

For San Ysidro, the implementation of the hybrid solution would take some work since little to no infrastructure exists. However, the government already owns the land through which the six lanes of freeway pass. CBP would have to acquire the money for the development and design of the expansion and the technology it needed for these lanes and the other offices and areas required for this solution. The flow of traffic would potentially slow down a little but CBP could monitor the wait times and keep them under 15 minutes, which is much less than Policy Option B. In addition, the time it takes to implement this solution would be the time it takes to hire the personnel, develop and design the facility, acquire budgeting, educate the public, and finish construction of the project. The total for this hybrid solution using the lane costs, personnel and the outreach costs would be \$14,790,796 compared to the \$71,757,815 costs for Policy Option B.

C. ANALYSIS

In looking at both the Lincoln-Juarez and San Ysidro POEs, it is apparent that both have very different footprints or infrastructure. Continuing with the status quo under Policy Option A will not maximize the ability of CBP to identify and seize bulk cash or weapons intended for the DTOs at either location. The implementation of Policy Option B at both POEs would increase the amount of bulk cash and weapons seized by looking at more cars and people but at a significant cost monetarily and to the free flow of traffic. The wait times for the San Ysidro POE if mirroring the inbound wait times could reach over two hours into Mexico, which would affect all traffic and trade in the San Diego area. The

¹⁷ Local statistical data from the San Ysidro POE that will not be released.

Lincoln-Juarez Bridge, although on a city street, leads straight to Interstate 34, which if Policy Option B were implemented, would significantly back up traffic throughout the Laredo area as well. The loss of trade and low public perception due to the wait times and the costs are inhibitors to implementing Policy Option B.

In both locations, space issues occur as well. No additional space to extend the footprint of the port to twelve lanes exists around the Lincoln-Juarez Bridge, and the City of Laredo owns that bridge and is unlikely to sale what little property is available and relinquish its ability to make money. Each location would have to overcome multiple barriers to implement this option to include the following.

- Securing funding for construction
- Securing funding for property rights
- Securing funding for personnel
- Hiring personnel
- Training personnel
- Hiring design and construction company
- Execute environmental assessments
- Securing funding for outreach activities
- Time it takes to complete construction

Although it is assumed that a 100% increase in seizures in both locations would occur, the high costs, difficulty of implementing such a policy and the poor flow of traffic, would not make Policy Option B a good option to implement.

Policy Option C is the best possible option for CBP to implement. It gives CBP leverage in looking at each individual location to determine exactly what infrastructure and technology could be installed based on the individual footprint of the POE. A determination of the amount of personnel needed would depend on the amount of infrastructure installed. Although a slight increase in traffic wait times might occur at peak travel time, this option would not adversely affect the commerce or public, and therefore, the perception would be good.

Policy Option C does require that CBP secure funding for this initiative. Congress is more likely to fund this hybrid solution based on CBP maximizing the space available in the current footprint of the POE and identifying the benefits of a 50% increase in the first year after the POE is operational. It is expected that as the officers become more familiar with the outbound environment, the number of weapons seizures and the amount of bulk cash identified may increase.

A key component of Policy Option C is the intelligence sharing between agencies. DHS, at the highest level, needs to engage federal, state and local agencies to open a free flow of intelligence between agencies to be effective. Agencies need to work together and share information in reference to potential targets of bulk cash and weapons smuggling into Mexico.

Table 5 shows the judging criteria and the policy options for each location. Assumptions have been made in this thesis based on officer experience and logic; if CBP puts more people out there with more infrastructure and technology to look at vehicles and people, then more seizures will occur.

Lincoln-Juarez Bridge	Policy Option A	Policy Option B	Policy Option C
Amount of Bulk Cash Detected	\$5 Million	\$10 Million	\$7.5 Million
Number of Weapons Seizures	12	24	18
Ease of Implementation	Easy	Difficult	Medium
Cost	No additional Funding	\$27 Million	\$4.65 Million
Free Flow of Traffic	0-5 Minutes	60 Minutes	10 Minutes

San Ysidro POE	Policy Option A	Policy Option B	Policy Option C
Amount of Bulk Cash Detected	\$2 Million	\$4 Million	\$3 Million
Number of Weapons Seizures	2	4	3
Ease of Implementation	Easy	Difficult	Medium
Cost	No additional Funding	\$71 Million	\$14.7 Million
Free Flow of Traffic	5-10 Minutes	120 Minutes	15 Minutes

Table 5. Assessment Information for Lincoln-Juarez Bridge and San Ysidro POE

VII. CONCLUSION AND RECOMMENDATIONS

Studies indicate that the DTOs are continuing to operate and produce narcotics that are illegally transported across the borders. DTOs use multi-modal ways to attempt to smuggle the dope into the United States to sale. The profits from the drug sales are believed to be gathered in bulk and stored at stash houses throughout the United States (DOJ, 2010, p. 2).

The primary role of bulk cash shipments into Mexico to the DTOs is to pay the operating costs for the various DTOs. This money is also used for corrupting law enforcement and government officials and for the DTO members to live extravagantly (Farah, 2010, p. 11). The bulk cash smuggling into Mexico will likely continue due to the U.S. anti-laundering regulations implemented after September 11, 2001 (Farah, 2010, p. 12).

To limit the DTOs' ability to continue to operate, the flow of bulk cash needs to be stopped. It is unrealistic to think that CBP working alone could identify all of the bulk cash being smuggled into Mexico. However, CBP would put a dent in the profits of the DTOs by identifying and seizing more bulk cash attempting to go south. Policy Option C or the hybrid solution would allow CBP to identify more bulk cash while minimizing costs. Policy Option B would allow for seizures of bulk cash as well but with the costs both for the construction, personnel, and loss of trade and commerce due to high traffic volumes, the hybrid solution would be the best option.

As stated in this thesis, the violence in Mexico continues to grow and deaths are rising in Mexico each year. The weapons being smuggled into Mexico from the United States are contributing to the violence. The high-powered automatic weapons are being used by the DTOs to combat law enforcement, the military and other rivals to secure their territories. To lessen the violence, the United States can assist Mexico by identifying more weapons going south. Policy Option C is the best way for CBP to assist in curbing the illegal exportation of

weapons going south into Mexico. As stated previously, federal, state and local agencies need to develop and share intelligence on people and vehicles known to have a nexus with bulk cash, weapons, narcotics or human smuggling, which will allow CBP to target those people and conveyances under Policy Option C and stop more of the drug profits and weapons going south.

The Border Enforcement Security Task Force (BEST) is a multi-agency task force that seeks to identify and dismantle criminal organizations, such as the DTOs. The BEST initiative is lead by ICE under direction of the Secretary of DHS. Ten task forces on the SWB concentrate on the threats on the SWB in their area (Finklea, 2010, p. 28). This task force should work with CBP in the outbound environment in sharing intelligence targets for CBP to stop while attempting to go south. Valuable intelligence from this group is needed by CBP to be more productive in the outbound arena.

Various other task forces within the federal, state and local law enforcement on the SWB could add to the intelligence needed by CBP to be effective. DHS needs to be a proponent of intelligence sharing within its own investigatory agencies, as well as to other federal, state and local agencies. In doing so, the ability to seize bulk cash and weapons will improve.

The more money and weapons seized by CBP on the SWB will inhibit the DTOs' ability to continue to operate as they currently do. Without the weapons, the DTOs will not have an advantage over local, state and federal law enforcement. Their ability to intimidate others and kidnap and kill will be limited as the weapons are seized and their arsenal is depleted.

To cut off the flow of their profits is critical in attempting to disband or weaken the DTOs. If they are not profiting from the illicit sale of narcotics because CBP is seizing the bulk cash then their ability to operate and continue producing narcotics will lessen.

Although CBP has moved towards outbound operations on the SWB, the need to strengthen the operations is vital to combating the DTOs. Some POEs

are currently conducting outbound operations on the SWB, such as Lincoln-Juarez and San Ysidro. However, to be more effective on the SWB and identify more bulk cash and weapons going south, CBP needs to implement Policy Option C. This hybrid solution will maximize CBP's ability to adapt to the current infrastructure in place, assess the most beneficial technology to implement, and determine the need for personnel and hours of operation. At the same time, it will be a more cost effective solution to implement.

Although this thesis provided some estimates on costs, each location would need to be assessed to determine true costs for implementing any solution. It is clear that Policy Option A is the most inexpensive but it is also promotes the lowest productivity across all of the SWB POEs. Policy Option B is the most expensive with excessive costs for personnel and infrastructure. This option would provide CBP with more opportunities to identify bulk cash and weapons, but would be unrealistic in many locations due to the inability to expand the POE due to limited space, and the inability to purchase property rights.

It is clear that the DTOs are continuing to operate and produce narcotics being smuggled into the United States. The sale of narcotics in the United States is the primary source of revenue for the DTOs to continue their drug operations. In addition, the profits from drug sales in the United States allows the DTOs to corrupt and bribe law enforcement and government officials, as well as to purchase automatic weapons to be smuggled south. With these weapons, the DTOs combat other DTOs for territory and continue to combat law enforcement efforts to stop the violence and drug producing business in Mexico.

The Merida Initiative announced in October of 2007 was implemented by the United States and Mexico to combat DTOs, and the violence and crime committed by the DTOs. Congress appropriated \$700 million dollars to assist Mexico with training, provide equipment and reform legislation (Beittel, summary page, 2009). More needs to be done to dismantle the DTO organizations and the crimes that they commit. Policy Option C is a way that CBP could contribute to

identifying bulk cash and weapons. In doing so, it is anticipated that the operations of the DTOs and the violence would decrease because the flow of bulk cash and weapons into Mexico would decrease.

To achieve Policy Option C, CBP would have to do site visits or rely on previous site visits to determine the current infrastructure in place at each POE. However, most if not all of this information already exists with the Office of Field Operations in the mission support division and the Office of Information Technology.

Each POE could have different levels of infrastructure, technology and personnel put into place based on the footprint of the southbound lanes and the amount of traffic that flows southbound into Mexico. CBP could use a phased in approach and prioritize the delivery of such a solution based on the threat of the DTOs on the other side of the border. With a strong policy option identified in Policy Option C, CBP would have transparency to show Congress when asking for the resources to implement such a solution.

The time it takes to implement Policy Option C would be dependent upon the magnitude of work needed. In addition, the policy option could be delivered in phases. For example, mobile technology units could be given to officers working outbound until additional infrastructure and personnel could be added, which is currently being done on a small scale already. As funding becomes available and technology improves, additions can be added to individual locations based on site surveys and threat assessments.

Policy Option C gives CBP flexibility in how much infrastructure and technology are needed and the personnel can be dependent upon how many shifts are being worked. However, to maximize the ability to detect export violations, such as bulk cash and weapons, CBP needs to ask for additional officers to work these outbound lanes. If no officers are available to work the outbound lanes, then even those targets identified by new technology implemented by new license plate readers will not be stopped and apprehended.

In recommending Policy Option C, after analyzing costs, effectiveness and ability to move traffic, it was apparent that this option made the most sense for CBP to adopt. In many locations where a lot of traffic does not move southbound, the minimal amount can be placed in that location. CBP could decide the hours of operation for the outbound teams and how many officers it would take to operate outbound inspections. Pulse and surge operations could be used based on traffic patterns or threat, and the officers would still have an advantage under this option because some technology would already be in place. For San Ysidro, which has little to no infrastructure, it would provide for a safer environment for the officers to work under and the ability to identify more vehicles and people involved in bulk cash and weapons smuggling. At the same time, it would improve CBP's ability to identify stolen vehicles, and those individuals wanted for crimes in the United States. This solution would also improve the ability to determine who is departing the United States across the SWB.

A clear need exists for a policy for outbound operations on the SWB. CBP has the authority to conduct outbound inspections, and if there is an interagency intelligence sharing initiative implemented as outlined in Policy Option C, this policy option will maximize the ability to prevent bulk cash and weapons smuggling into Mexico.

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