

Stenographic Transcript
Before the

CAUCUS ON
INTERNATIONAL NARCOTICS CONTROL

UNITED STATES SENATE

THE ROLE OF THE FEDERAL GOVERNMENT IN
ATTACKING THE FINANCIAL NETWORKS OF CARTELS

Tuesday, July 12, 2022

Washington, D.C.

ALDERSON COURT REPORTING
1111 14TH STREET NW
SUITE 1050
WASHINGTON, D.C. 20005
(202) 289-2260
www.aldersonreporting.com

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1 THE ROLE OF THE FEDERAL GOVERNMENT IN ATTACKING THE
2 FINANCIAL NETWORKS OF CARTELS

3
4 Tuesday, July 12, 2022

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6 U.S. Senate
7 Caucus on International Narcotics Control
8 Washington, D.C.
9

10 The caucus met, pursuant to notice, at 2:00 p.m., in
11 Room SD-215, Dirksen Senate Office Building, Hon. Sheldon
12 Whitehouse, chairman of the caucus, presiding.

13 Present: Senators Whitehouse [presiding], Blumenthal,
14 Hassan, Grassley, and Cornyn.

1 OPENING STATEMENT OF SENATOR WHITEHOUSE

2 The Chairman. Consider us virtually gaveled in. I
3 want to thank the witnesses for attending. This is a fully
4 remote hearing. I just got off 9 days of COVID. So I am
5 very, very sensitive to making sure we keep ahead of this.
6 That was not a thrill.

7 So I will lead with an opening statement. Chuck, we
8 can then turn to you for an opening statement. We will
9 then hear from the two witnesses, and we will go on to Q&A,
10 if that is all right?

11 So, drug cartels like kleptocrats and other criminals
12 skirt U.S. laws and exploit regulatory gaps to launder and
13 protect the proceeds of their crimes, and they do that in
14 an international dark economy that facilitates much evil in
15 the world. The U.S. must do more to expose and dismantle
16 the cartels' finances and these international dark economy
17 networks.

18 First, we need to better understand the magnitude of
19 narcotics-related illicit finance and how it fits into the
20 international dark economy. The Office of National Drug
21 Control Policy prioritized dismantling the financial
22 networks of cartels in its 2022 National Drug Control
23 Strategy, but we currently lack a system to track
24 narcotics-related illicit finance investigations across the
25 various National Drug Control Program agencies.

1 As a result, we don't have a credible estimate of the
2 narcotics-related funds laundered through the U.S.
3 financial system, and we don't know if our efforts to
4 counter those networks are effective. The Justice
5 Department can remedy this by collecting information on all
6 relevant investigations and prosecutions.

7 Second, we must insist on better efforts in partner
8 nations to defend their institutions from corruption and
9 ensure narcotics traffickers are successfully prosecuted.
10 To that end, Co-Chair Grassley and I wrote to Treasury,
11 urging it to use the attache and liaison programs
12 authorized by the Fiscal Year 2021 National Defense
13 Authorization Act to deploy to allied countries experts
14 with experience in narcotics-related illicit finance. Weak
15 efforts and even outright support of the dark economy
16 should have both diplomatic and trade consequences.

17 Third, we should strengthen effective programs to
18 combat trade-based money laundering, like the part of
19 Homeland Security's Trade Transparency Units. The
20 Department has agreements with 18 partner nations, which
21 let U.S. law enforcement and their international
22 counterparts generate actionable leads against criminal
23 organizations involved in trade-based money laundering.
24 Costing about \$200,000 each to implement, Trade
25 Transparency Units are net revenue raisers and should be

1 expanded and encouraged to share data with relevant U.S.
2 counterparts to the extent allowable under bilateral
3 agreements.

4 Fourth, we must close loopholes cartels use to launder
5 their illicit proceeds, for instance, in the real estate
6 sector, or with investment advisers, or even via stored
7 value instruments like gift cards. The administration
8 should start by making geographic targeting orders
9 permanent, nationwide, and applicable to commercial real
10 estate; by imposing reporting requirements on investment
11 advisers; and by implementing a final rule subjecting
12 stored value cards to cross-border reporting requirements.

13 Congress can help strengthen and modernize our anti-
14 money laundering framework. Co-Chair Grassley and I have
15 introduced the Combating Money Laundering, Terrorist
16 Finance, and Counterfeiting Act of 2022 to increase
17 penalties for commonly used money laundering methods like
18 bulk cash smuggling and tax evasion and provide additional
19 tools to keep up with newer techniques such as those used
20 by Chinese money laundering organizations.

21 And finally, we need to make better use of sanctions.
22 Through the Russian Elites, Proxies, and Oligarchs Program
23 and the KleptoCapture Task Force, we have seen the power of
24 sanctions. I am pleased that the Office of National Drug
25 Control Policy in its 2022 National Drug Control Strategy

1 calls to increase the number of individuals and entities
2 targeted as transnational criminal organization enablers
3 through sanctions by 365 percent by 2025. Good. Go get
4 'em!

5 Cartels who exploit our financial system and those who
6 enable them to do so are complicit in the nearly 108,000
7 drug overdose deaths that occurred in the United States in
8 2021. It is both a health and a national security
9 imperative that the Federal Government dismantle the vast
10 international dark economy that enables drug trafficking
11 organizations' illicit finance.

12 I look forward to hearing from our witnesses about
13 their agencies' respective roles in doing so. However, I
14 must note my disappointment with the Department of Justice
15 for its refusal to provide a witness for this hearing
16 despite ample notice. As the sole prosecuting agency for
17 narcotics and money laundering cases, its testimony would
18 have been valuable to this caucus. This seems to be an
19 unfortunately persistent problem for the Department, very
20 different from other executive agencies.

21 And with that, I turn it over to Co-Chair Grassley.

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1 STATEMENT OF SENATOR GRASSLEY

2 Senator Grassley. First of all, Mr. Chairman, I want
3 to agree with you on what you just said about the Justice
4 Department not here, coming to this hearing. It is too
5 often that we get that as an answer not only for our drug
6 caucus meeting, but also sometimes for the Judiciary
7 hearing.

8 Today's hearing offers us a very good opportunity to
9 continue our focus on drug trafficking organizations and
10 how to combat them. The revenue generated by cartels is
11 very, very massive, the illicit drug markets valued in the
12 hundreds of billions of dollars per year and, of course,
13 with no sign of slowing down.

14 Once cartels get their hands on dirty money, it is
15 very quickly moved and laundered so criminals can profit
16 from their crimes, and they do profit. The dirty money
17 cartels count on is part of a larger international
18 financial network. Cartels are known to be partners with
19 professional money laundering organizations, including
20 those based in China, to execute and profit from their
21 criminal schemes.

22 Drug trafficking organizations also launder money
23 through American financial systems in new ways -- e-
24 commerce, cryptocurrency, convoluted shell companies.
25 Following and targeting the money is an important piece of

1 the fight against cartels and the scourge of drug
2 trafficking, but we can't minimize the importance of drug
3 enforcement and stopping the supply of drugs into our
4 country. After all, money laundering doesn't exist without
5 drug trafficking.

6 Our drug crisis has been fueled by a steady flow of
7 deadly drugs, including fentanyl, coming across our
8 borders. Just this weekend, a record 5,000 pounds of meth
9 was seized in southern California, and the results are then
10 that tens of thousands of overdose deaths in America each
11 year happen.

12 Precursor chemicals for lethal drugs like fentanyl and
13 methamphetamine are produced in China, shipped to Mexico,
14 where these cartels in Mexico make the fentanyl. The
15 deadly drugs are then taken across the Southwest border,
16 where they are distributed throughout our great country.

17 This triangle of deaths among China, Mexico, and the
18 United States show that organized drug traffickers don't
19 respect or stop at international borders because if they
20 did, they wouldn't be successful. So we find them pushing
21 their deadly trades. Dirty drug money also motivates and
22 empowers cartels to commit crimes that is and are more
23 violent and spreads corruption.

24 Drug trafficking organizations use dirty money to buy
25 aerial drones so that they can fly deadly drugs across our

1 border, which is why I introduced the bipartisan Drone Act
2 of 2022 to combat this new threat, which our colleague
3 Senator Hassan co-sponsors. It is clear that we need more
4 tools to fight sophisticated transnational criminal
5 organizations. We can do this by modernizing and
6 strengthening our laws to beef up drug enforcement and
7 money laundering tools.

8 Earlier this year, I reintroduced a piece of
9 legislation I entitled Combating Money Laundering,
10 Terrorist Finance, and Counterfeiting Act. I am glad to
11 say that Senator Whitehouse is my Democratic lead sponsor
12 and that Senator Cornyn is an original co-sponsor. This
13 legislation will improve law enforcement [audio
14 malfunction].

15 Senator Grassley. -- here today are witnesses from
16 two agencies, the State Department and the Treasury
17 Department. I am thankful to Senator Whitehouse for
18 arranging these witnesses to be here.

19 I also appreciate Senator Whitehouse and I coordinated
20 to have a DOJ witness here, but they refused. I am
21 disappointed that the Department of Justice, the key
22 Federal agency charged with investigating and prosecuting
23 drug money laundering crimes, refused to send a witness to
24 this important hearing.

25 Thank you to our witnesses. Thank you to Chairman

1 Whitehouse for this hearing. I look forward to the
2 testimony and opportunity to ask questions.

3 The Chairman. Thanks very much, Co-Chair Grassley.

4 And I am delighted to see Senators Blumenthal and
5 Cornyn have joined us.

6 I will now take a moment to introduce our two
7 witnesses. Brian Nelson is the Under Secretary for
8 Terrorism and Financial Intelligence at the Department of
9 the Treasury. Prior to joining Treasury, he was the chief
10 legal officer at the Organizing Committee for the 2028
11 Olympic and Paralympic Games and previously served in
12 government as the senior policy adviser, policy chief, and
13 general counsel in California's Department of Justice,
14 where maybe they send somebody to show up for hearings at
15 the legislature.

16 Anyway, he oversaw key national security initiatives,
17 including efforts to combat transnational criminal
18 organizations -- highly relevant to this hearing --
19 dismantle human trafficking networks, and build State and
20 international partnerships to stop money laundering and
21 high-tech crimes.

22 I will call on you in one second, Brian, but I want to
23 also introduce Ambassador Todd Robinson, who is the
24 Assistant Secretary for the Bureau of International
25 Narcotics and Law Enforcement Affairs at the State

1 Department. Ambassador Robinson has served in a number of
2 capacities at the State Department, including as senior
3 adviser for Central America in the Bureau of Western
4 Hemisphere Affairs; as the charge in Caracas, Venezuela;
5 and as the U.S. Ambassador to the Republic of Guatemala, a
6 position previously held many, many years previously by my
7 grandfather, when they called it "minister" and not
8 "Ambassador."

9 And because of Ambassador Robinson's Rhode Island
10 history, I had the honor of introducing him for his hearing
11 for that position. So I am excited to see him back here
12 and acknowledge him as a career minister in the State
13 Department.

14 Under Secretary Nelson, why don't you go first for
15 5 minutes, and then we will turn to Ambassador Robinson.

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1 their supporters from the international financial system;
2 closing outstanding regulatory gaps; and working with
3 international partners.

4 Of course, drug overdose deaths here in the United
5 States are exacting a terrible toll on American families
6 with, as you noted, an estimated 108,000 deaths in 2021,
7 which is an increase of 15 percent from the previous year.
8 But such numbers do not only represent a public health
9 crisis. As you said, they also represent a threat to U.S.
10 national and economic security.

11 As documented in the 2022 National Money Laundering
12 Risk Assessment, the movement and laundering of drug
13 proceeds in the United States continues to be dominated by
14 traditional methods and techniques, such as all-cash
15 smuggling, trade-based money laundering, and others. Law
16 enforcement has been seeing an increase in TCOs' use of
17 Chinese money laundering organizations. These offer
18 services at lower fees than traditional money brokers.
19 They exploit Chinese currency controls and use
20 communication technology effectively.

21 TCOs are also growing comfortable with darknet markets
22 and the use of digital assets to launder funds, although
23 our assessment is the size and scope of this activity
24 remains low in comparison to cash-based retail street
25 sales.

1 In order to address these challenges, we are
2 undertaking several high-impact actions. The measures we
3 require of certain private sector entities, including due
4 diligence, recordkeeping, and reporting requirements,
5 provide the basis for law enforcement investigation of all
6 manner of illegal activity, including drug trafficking.
7 This information also informs the use of sanctions
8 authorities, which are among our most effective tools for
9 targeting the command, control, and financial facilitation
10 infrastructure of TCOs worldwide.

11 The President's December 2021 executive order,
12 EO 14059, imposing sanctions on persons involved in the
13 global illicit drug trade, will support the
14 administration's priority to disrupt the operations of the
15 drug cartels, who direct the supply of illicit drugs to
16 U.S. markets. The EO affords our Office of Foreign Assets
17 Control greater flexibility to sanction foreign actors
18 involved in narcotics trafficking that threaten U.S.
19 national security.

20 Our first tranche of designations under this expanded
21 authority was in December of 2021, and they targeted TCOs
22 based in Brazil, China, Colombia, and Mexico. The
23 financial intelligence we collect also informs our efforts
24 to close regulatory gaps in order to ensure the U.S.
25 AML/CFT framework is fit for purpose in addressing an

1 evolving threat environment. As you are aware, Treasury is
2 currently undertaking rulemaking to implement the key
3 provisions of the Corporate Transparency Act to deny
4 illicit actors the ability to hide behind anonymous front
5 and shell companies.

6 Another priority in this category is addressing how
7 drug traffickers exploit the U.S. real estate market. Our
8 Financial Crimes Enforcement Network is pursuing a
9 rulemaking process to address how criminal actors exploit
10 the U.S. real estate sector by bringing greater
11 transparency to nonfinance transactions.

12 Another important component of our counternarcotics
13 strategy is international engagement, as you both noted.
14 My first trip as Under Secretary was to Mexico, and this
15 was an essential opportunity to build relationships with
16 key counterparts. While there, I met with public and
17 private sector partners to discuss ways to enhance our
18 collaboration on counternarcotics, human smuggling, and
19 anti-corruption. We will also continue to support ongoing
20 administration efforts to engage China on counternarcotics,
21 including encouraging and pressing Beijing to curtail the
22 illicit diversion of Chinese origin precursor chemicals to
23 Mexican drug cartels.

24 So long as major criminal organizations either use or
25 threaten the U.S. financial system, the Treasury Department

1 will maintain these significant lines of efforts. So, with
2 that, I will close by thanking the caucus again for your
3 support, and I look forward to your questions.

4 Thanks very much.

5 [The prepared statement of Mr. Nelson follows:]

6 [CAUCUS INSERT]

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1 The Chairman. Thank you very much, Under Secretary.

2 And now let me turn to Ambassador Robinson.

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1 STATEMENT OF AMBASSADOR TODD D. ROBINSON, ASSISTANT
2 SECRETARY, BUREAU OF INTERNATIONAL NARCOTICS AND LAW
3 ENFORCEMENT AFFAIRS, U.S. DEPARTMENT OF STATE

4 Ambassador Robinson. Chairman Whitehouse, Co-Chairman
5 Grassley, and distinguished members of the caucus, thank
6 you for this opportunity to testify before you today and to
7 join my good friend Brian Nelson, the Under Secretary at
8 Treasury, regarding the Bureau of International Narcotics
9 and Law Enforcement efforts to attack the financial
10 networks of cartels.

11 Disrupting the illicit finance of cartels is essential
12 to reduce the devastating impact of illicit narcotics on
13 the United States. This is integral to INL's mission to
14 keep Americans safe by countering threats from crime,
15 illegal drugs, and instability abroad.

16 Cartels are modernized and diversified. They finance
17 their criminal enterprises trafficking not only plant-based
18 drugs, but also precursor chemicals. Along with fueling
19 corruption, they are involved with highly profitable
20 synthetic drug manufacturing, trafficking and smuggling of
21 humans and wildlife, network hacking, and illicit mining.
22 They have access to global supply chains and markets,
23 combined with their local influence in areas with weak
24 governance structures and instability.

25 The results have been devastating. Drug overdoses

1 were responsible for over 100,000 deaths in the United
2 States last year. Synthetic opioids, especially fentanyl
3 are now the leading cause of death for Americans age 18 to
4 45. Most illicit fentanyl is manufactured in or trafficked
5 through Mexico, but the challenge of chemical control is
6 global.

7 The throughline to all of it is money. Tackling
8 illicit finance is one way the administration is assisting
9 our international partners to counter criminal groups.
10 Over the last 3 fiscal years, INL has programmed and
11 implemented approximately \$85 million in funds to address
12 illicit finance related to narcotics. INL accomplishes
13 this through four main prongs.

14 First, INL, along with Treasury, the Department of
15 Justice, and other U.S. Government partners -- and other
16 U.S. Government entities, partners to support international
17 standards from bodies such as the Financial Action Task
18 Force.

19 Second, we work with partner governments to strengthen
20 legal and regulatory regimes and reduce vulnerabilities.

21 Third, INL mobilizes technical expertise to enable
22 partners to respond to emerging threats, including digital
23 assets such as cryptocurrencies and vulnerable sectors like
24 online gambling and illicit mining.

25 Finally, INL manages corruption-related visa

1 restrictions targeting individuals connected with illicit
2 finance and programs championing anti-corruption efforts.

3 In the Western Hemisphere, INL assistance promotes
4 effective justice systems, nonconviction-based asset
5 forfeiture to counter illicit finance networks, including
6 those connected to newer cartel revenue sources like
7 illicit mining, powerful tools to thwart cartels and combat
8 corruption.

9 In the Asia-Pacific region, in response to the surge
10 in drug trafficking and illicit proceeds, INL increased
11 assistance to East and Southeast Asia to enhance capacity
12 to investigate, prosecute, and adjudicate financial crime,
13 money laundering, and drug trafficking. INL also leverages
14 multilateral anti-corruption bodies -- including the United
15 Nations, Organization of American States, Asia-Pacific
16 Economic Cooperation, and G-20 -- to press countries to
17 implement anti-corruption and anti-money laundering
18 obligations and standards.

19 To reinforce our diplomacy and assistance, INL
20 aggressively deploys deterrence tools like visa
21 restrictions and rewards programs granted us by Congress.

22 Cartels and transnational criminals will continue to
23 develop new means to launder money. Consistent with the
24 President's budget request, INL needs resources flexible
25 enough to outpace evolving threats.

1 We must remain nimble in our ability to meet emerging
2 and future money laundering and other illicit financing
3 operations. We are confident that U.S. investment in
4 building partner capacity results not only in stronger laws
5 and more robust institutions, but also to ultimately save
6 lives and keep Americans safe at home.

7 Thank you.

8 [The prepared statement of Ambassador Robinson
9 follows:]

10 [CAUCUS INSERT]

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1 The Chairman. Thanks, Ambassador Robinson.

2 Under Secretary Nelson, are you comfortable with the
3 365 percent sanctions increased goal set by the National
4 Drug Control Strategy?

5 Mr. Nelson. Yes. Thank you for that question.

6 Obviously, our commitment and my commitment is to
7 increasing the number of counternarcotics sanctions using
8 EO 14059. But more than the numbers, we are really focused
9 on targeting high-impact targets in order to make a real
10 strategic impact, and that is reflected in the work that we
11 have done in terms of evaluating our sanctions authorities
12 and implementing better practices to ensure they are
13 efficient and effective.

14 The Chairman. So you signed off on the 365 percent
15 goal set by the Drug Control Strategy?

16 Mr. Nelson. I am focused on increasing the strategic
17 effect of our sanctions and increasing the numbers. We are
18 absolutely going to increase the efforts using the new tool
19 under the executive order that we have at 100 percent.
20 There is no question about that.

21 But what I have really been focused on is prioritizing
22 fentanyl and synthetic opioids networks by dedicating
23 significant investigative resources to that particular
24 problem set, which, again, is less about the numbers and
25 making sure that we are having strategic effect.

1 The Chairman. You mentioned that the beneficial
2 ownership regs, you are currently engaged in those. You
3 have been currently engaged since --

4 Mr. Nelson. Very much so.

5 The Chairman. -- for a very long time now. Will you
6 be wrapped up this year?

7 Mr. Nelson. Yes. So one thing is we are currently
8 very much engaged. As you know, we did our Notice of
9 Proposed Rulemaking of December of 2021 on the reporting
10 rule, which is the first piece of the three beneficial
11 ownership rulemakings. We have now received hundreds of
12 comments, and we are working through those as rapidly as
13 possible because we view this as a critical piece in
14 developing transparency and ability to obviously prevent
15 the use of our system by drug trafficking organizations and
16 a number of other illicit actors.

17 So it is a priority, not only of mine. It is a
18 priority of --

19 The Chairman. I am sure I can speak for Chairman
20 Grassley, who is my co-author, that we would love to see
21 you guys get this piece of work finished up.

22 Mr. Nelson. I would -- only two points -- just thank
23 you for that. It is incredibly important to our work. And
24 second, in order to effectively implement it once we have
25 these regs in place -- like I said, we are working on it as

1 quickly as possible -- we are going to need -- FinCEN is
2 going to need resources in order to implement it
3 effectively.

4 The Chairman. Yes. Well, we got you an additional
5 \$22 million from --

6 Mr. Nelson. And we thank you for that. We thank you
7 for that, and that is --

8 The Chairman. -- in May, and I had a lot to do with
9 that there because we are pushing hard on the KleptoCapture
10 stuff, and you are an important part of that effort.

11 Mr. Nelson. And we very much thank you for that.

12 The Chairman. Senator Grassley and I have the
13 Combating Money Laundering, Terrorist Finance, and
14 Counterfeiting Act of 2022. Would that help you better
15 attack financial networks, and do you support that bill?

16 Mr. Nelson. So recognizing that our staffs have, I
17 think, been in close contact and going through the bill, we
18 certainly -- and also recognizing that it primarily impacts
19 jurisdictions at Department of Justice and Department of
20 Homeland Security, we do agree that it makes important
21 strides towards remedying deficiency in the U.S. AML
22 regime, absolutely.

23 The Chairman. And last item --

24 Mr. Nelson. And we are happy to keep working on it
25 with you.

1 The Chairman. On GTOs, we have seen Pablo Escobar hid
2 money in the U.S. in real estate. A Mexican governor tied
3 to cartels --

4 Mr. Nelson. Yes.

5 The Chairman. -- has been caught with a lot of money
6 invested in U.S. real estate from Texas to Delaware. What
7 do you need to do to expand GTOs nationwide so that this
8 doesn't happen? So that they just can't get around the
9 localities where the GTOs operate and go to ones where they
10 know perfectly well they are not operating. How do we
11 solve that?

12 Mr. Nelson. So we have put out an Advance Notice of
13 Public Rulemaking on this question. We agree that GTOs are
14 temporary and obviously have limited geographic reach. We
15 support a permanent regulatory solution to address that
16 problem of anonymity in the real estate sector. So our
17 next step will be to publish a draft regulation and a
18 Notice of Proposed Rulemaking.

19 The Chairman. Good. Keep moving.

20 Mr. Nelson. Thanks.

21 The Chairman. Ambassador Robinson, one of the
22 President's signature proposals has been the Democracy
23 Initiative now under way. The Democracy Initiative pushes
24 at kleptocracy and autocracy and corruption around the
25 globe, and it focuses on the international dark economy

1 through which very often Western rule of law nations
2 support and sustain the kleptocracy, autocracy, and
3 criminality that is the bane of our existence, if not our
4 outright enemy.

5 And I am wondering if you can assure me how
6 effectively the State Department at this point has
7 connected the dots between the Democracy Initiative, the
8 international dark money economy that supports it, and your
9 purview of illicit finance supporting the international
10 narcotics trade?

11 Ambassador Robinson. Thank you so much, Senator, for
12 that question.

13 We are focused on working with our interagency
14 partners and our international partners to make sure we are
15 creating effective structures around the world to go after
16 these transnational organized criminals and specifically
17 their assets. We continue to work with the U.N. We
18 continue to work with the G-20. We continue to work with
19 FATF to make sure that we are working with our partner
20 governments to create the structures and create the
21 networks among our partner governments to go after this
22 illicit finance.

23 The Chairman. And the places that allow or encourage
24 illicit funds to be held and hidden are an important
25 infrastructure for the narcotics trafficking interests to

1 dispose of, invest, and hide its corrupt proceeds.

2 Correct?

3 Ambassador Robinson. That is correct. And that is
4 why we take very seriously our engagement with important
5 countries in the region.

6 So I traveled to Mexico with Under Secretary Nelson as
7 my first trip in this job. I just recently traveled to
8 Asia and had discussions about this in Thailand, Vietnam,
9 and Laos and found them to be willing partners in our
10 effort to go after trafficking across the board. And I,
11 2 weeks ago, just came back from Pakistan, where again I
12 engaged with our partners in Pakistan to focus on working
13 with their agencies and their structures so that we can
14 monitor better the illicit financing that is happening.

15 The Chairman. Well, I will wrap up by turning it over
16 to Co-Chair Grassley, but with the observation that there
17 is a common thread through a lot of the evil in the world,
18 and it is the dark economy that supports the evildoers'
19 ability to hide the assets that they have either extracted
20 wrongfully from their country or taken in bribes or earned
21 through criminal proceeds.

22 And I think we have got to see that network as a
23 target in its own right, and if we can fix that, like in
24 Star Wars, they took out the death star and everything else
25 got better? We need to go after the dark money death star,

1 and I hope you continue to pursue that.

2 Co-Chair Grassley?

3 Senator Grassley. First of all, I want to apologize
4 to my colleagues and to the witnesses. I have a freeze
5 problem on my end here with this instrument. So if that
6 happens, it is about 10 seconds you tend to lose until it
7 straightens itself out. So be patient if I stop in the
8 middle of my questions to you.

9 Ambassador Robinson, I thank you for being here today.
10 The relationship between China and Mexico with regard to
11 illicit drugs is very evident. China-based criminals make
12 money by shipping precursor chemicals to Mexico, where they
13 are made into fentanyl and shipped into our country.

14 What is the extent of the Chinese criminal
15 organization relationship with the Mexican cartels, and why
16 is it important for policymakers to understand China's
17 role, including any involvement by the Chinese government
18 as part of the economics of cartels?

19 Ambassador Robinson. Thank you, Senator, for that
20 question.

21 First of all, I think we have to be careful about
22 linking the Chinese government with Chinese cartels and
23 Mexican cartels. I don't think we have made that direct
24 link yet. But you are absolutely right. There is no doubt
25 Chinese transnational organized crime -- criminal

1 organizations are working with Mexican criminal
2 organizations and probably other criminal organizations to
3 move precursors from China, often through some of our
4 partner countries like, as I mentioned earlier, Vietnam,
5 Thailand, and Laos, to Mexico.

6 There is no doubt the Chinese government is not doing
7 enough to monitor these precursor chemicals, to schedule
8 these precursor chemicals, and to know who is collecting
9 the precursor chemicals on the other end in Mexico. We
10 continue to try to engage with the Chinese government on
11 this. They have sort of been reluctant to engage with us,
12 but we keep at it.

13 We are in very close discussions with the Mexican
14 government. In fact, as you know, Mexican President Lopez
15 Obrador is in town today and tomorrow. The Bicentennial
16 Framework, which we have worked out -- which was worked out
17 partially with our colleagues at the Department of
18 Treasury, allows us to do so much more on synthetic drugs,
19 attacking synthetic drugs the way we attack plant-based
20 drugs and money laundering under Merida and also gives us
21 an opportunity to work more closely on the Southwest border
22 with our Mexican contacts.

23 So you are absolutely right. The Chinese are not
24 doing enough. The Chinese government is not doing enough.
25 The Chinese cartels are working with Mexican cartels, and

1 we are working closely with Mexico, trying to engage more
2 with China on this issue.

3 Senator Grassley. Do you have any suggestions of any
4 steps Congress should take to help you with this problem?

5 Ambassador Robinson. No, I think Congress has
6 actually done a very good job in supporting us in this
7 effort. What I would say is -- and you probably heard this
8 a lot from those of us in INL -- flexibility with the
9 resources you graciously give us is key. And our ability
10 to move money around to programs and projects quickly could
11 always be more helpful.

12 Senator Grassley. Also to you, Ambassador Robinson,
13 cartels across the globe fuel corruption in our developing
14 nations to launder their money. Young democratic
15 governments and judicial systems often fail to address this
16 issue due to lack of capacity.

17 China's global reach and international influence is
18 extensive, especially in the developing worlds of South and
19 Southeast Asia. INL support of the Department of Justice
20 OPDAT and ICITAP programs is critical to building anti-
21 money laundering capacity in these regions.

22 What is the INL doing to ensure that OPDAT and ICITAP
23 programs are being used in the best way to combat money
24 laundering and related corruption in the developing world,
25 especially in Southeast Asia? How can these programs be

1 improved, if at all?

2 Ambassador Robinson. Thank you again, Senator.

3 The INL is working very closely with OPDAT and ICITAP
4 on programs again in the countries that I mentioned --
5 Vietnam, Laos, and Thailand. We work very closely. We
6 have great programming in those countries.

7 We are also expanding our programming in Mexico, in
8 Central America, all with the aim of increasing the
9 capacity of our partner countries to monitor illicit
10 financing and anti-money laundering. We will continue to
11 support our colleagues in the Department of Justice at
12 OPDAT and ICITAP in those endeavors.

13 We also -- I should mention we have great programming
14 in the Caribbean. We have noticed increased activity by
15 Chinese transnational organized criminal networks in the
16 Caribbean. OPDAT and ICITAP are there. We are working
17 hand-in-hand to make sure that we are working with our
18 Caribbean partners to go after these networks.

19 Senator Grassley. Okay. Mr. Chairman, my time is up.
20 I have some questions I will submit to Under Secretary
21 Nelson for answer in writing.

22 The Chairman. Our other colleagues who are present
23 have signed off. So it is just the two of us. If you want
24 to do another round, I have got a couple of questions that
25 I will ask, if that is all right?

1 Senator Grassley. Could I do one question to Under
2 Secretary Nelson?

3 The Chairman. Right now, sure. You go ahead.

4 Senator Grassley. And then I will have to -- I will
5 have to go to the floor to vote.

6 I thank you, Mr. Nelson, for coming. You hold an
7 important role in our fight against illicit drug use by
8 removing financial incentives to deal. In addition to drug
9 enforcement, investigating and prosecuting money laundering
10 crimes will help to reduce the profit that accompanies drug
11 trafficking. This focus is critical to our Nation
12 experiencing record-breaking overdose deaths.

13 We know that as anti-money laundering laws become
14 stricter, cartels are forced to become more creative and
15 sophisticated in the way that they launder this money. So
16 I would like to know your views on whether bulk cash
17 smuggling remains common and what ways have the financial
18 networks of drug cartels become more sophisticated in
19 trying to avoid law enforcement, particularly with
20 technological advancements and automation?

21 Mr. Nelson. Thank you for that question and totally
22 agree with you that this continues to be an incredibly
23 dynamic problem set that we are facing. And we see the
24 incredible consequences of this illegal drug trade and use
25 of not only our financial system, but in the international

1 financial system in order to support it.

2 I would say we are still seeing traditional money
3 laundering techniques, as you noted, like cash-based
4 transfers. But that being said, we are starting to see
5 drug traffickers use new technologies to skirt our AML
6 laws. Particularly, we are seeing drug trafficking
7 organizations and other transnational criminal
8 organizations becoming more comfortable with so-called
9 darknet markets and use of virtual currency to launder
10 funds, although, again, sort of the size and scope of the
11 proceeds that are generated on those platforms remain
12 relatively low just in comparison to cash.

13 So we are looking closely in that vein at sort of
14 illicit financing risks that we face in the context of
15 virtual assets, and given that there is a lack of
16 international implementation of AML/CFT standards across
17 virtual assets, how we can work with partner countries in
18 order to create consistency in our AML/CFT obligations for
19 virtual assets, which will be incredibly important.

20 And we, at the Treasury Department, have sanctioned a
21 number of key nodes within that ecosystem, including
22 virtual asset service providers, darknet markets including
23 those associated with Russia and other types of nodes, like
24 mixers that are designed to or at least in practice can
25 sort of obtuse and prevent us from being able to identify

1 the beneficial effectively owner of that particular virtual
2 asset.

3 So we are working hard in this area because we do view
4 it as a source of significant risk and look forward to
5 continuing to obviously work with Congress on not only in
6 identifying the risk, but identifying tools, techniques,
7 and solutions going forward.

8 Senator Grassley. This will be my last question. How
9 are FinCEN and the Office of Foreign Assets Control
10 adapting their approaches to combat these new threats?

11 Mr. Nelson. Yes. So we are doing a lot in that vein.
12 So FinCEN recently released an advisory on illicit activity
13 involving convertible virtual currency. Happily, FinCEN,
14 if I can say, I think it is sort of within our Government,
15 has been really the leader on this issue because they have
16 been looking at virtual assets going back to, I believe,
17 2014. So it has been almost a decade.

18 And as you know, under the Anti-Money Laundering Act,
19 it clarified that virtual assets were also subject to
20 supervision by FinCEN as effectively as a fiat currency.
21 So these are going to be really important tools in our
22 ability and my team at FinCEN's ability to regulate this
23 space.

24 Senator Grassley. Thank you, Mr. Chairman. I am
25 going to sign off now.

1 The Chairman. Thank you, Co-Chair Grassley.

2 I will follow up on Senator Grassley's last question
3 by inquiring with respect to the Chinese money laundering
4 activities, you mentioned bulk cash, darknet,
5 cryptocurrencies, and other methods, have you been able to
6 use sanctions against any Chinese money laundering
7 organizations?

8 Mr. Nelson. Yes. As part of the new executive order
9 that the President signed in December of last year, our
10 first sort of tranche of designations related to these
11 Chinese-based entities that are sending precursor chemicals
12 to Mexico, as well as the financial infrastructure that
13 supports that.

14 So that has been a focus. In terms of the virtual
15 asset space, as you know, virtual coins are now illegal in
16 China. So we see less of that type of engagement in China
17 as opposed to other parts of the world.

18 The Chairman. Ambassador Robinson --

19 Ambassador Robinson. Senator? No, I just wanted to
20 chime in on the end of that.

21 The Chairman. Chime in.

22 Ambassador Robinson. We are working very closely with
23 OPDAT globally to help train governments on money
24 laundering techniques using cryptocurrencies. So --

25 The Chairman. The Chinese government?

1 Ambassador Robinson. I am sorry?

2 The Chairman. The Chinese government you are
3 training?

4 Ambassador Robinson. No, no, no, no, no. No. Our
5 partner governments. So in Vietnam, in --

6 The Chairman. Got it. Laos, Thailand, yes.

7 Ambassador Robinson. -- Laos, in Thailand. The
8 bottom line in particular, we have a 5-year -- a 5-year
9 program working, helping them work with their financial
10 intelligence units.

11 The Chairman. Because my understanding is that the
12 Chinese government has not been very helpful about
13 addressing money laundering concerns.

14 Ambassador Robinson. That is correct.

15 The Chairman. The Bicentennial Framework helps
16 coordinate our efforts with Mexico. Have you seen any
17 progress under that framework in dealing with financial
18 networks of Mexican cartels?

19 Ambassador Robinson. The Mexicans have gone after
20 financial money laundering cartels very aggressively, and
21 some of that has been because of our engagement through the
22 Bicentennial Framework.

23 I would also add, though, that they are not doing it
24 out of altruistic reasons. There is a growing demand for
25 the drugs that are being sent to the United States in

1 Mexico. They recognize that. They understand the
2 challenges they face with that. They see it happening in
3 our country. And so it is in their interest to go after
4 these networks, and I would argue that they are doing so
5 aggressively.

6 The Chairman. Good. Last question, and for both of
7 you, I am trying to continue to build a record for the
8 ENABLERS Act. It is part of the 2021 United States
9 strategy on countering corruption to make sure that what is
10 called by that strategy "key gatekeepers to the financial
11 system" cannot evade scrutiny.

12 We all know that if you are a bank, you have to follow
13 robust anti-money laundering procedures and that banks have
14 gotten readily accustomed to following those. But all you
15 have to do is go across the street to the investment
16 adviser, and you can do all the things that would be
17 illegal if done with the banks with the investment adviser
18 or the realtor or through a law firm.

19 And how important do you think it is for Congress to
20 give you the tools to expand beyond just the banking
21 industry and apply anti-money laundering authorities to all
22 these other key gatekeepers? Under Secretary first, then
23 we will close out with Ambassador Robinson, and I will go
24 vote.

25 Mr. Nelson. Very good, and absolutely look forward to

1 continue to work with you on this question.

2 We absolutely agree that there are financial
3 intermediaries, gatekeepers and the like, that are
4 obviously not covered by comprehensive AML/CFT obligations,
5 and we are looking at this question in particular very
6 closely, as you can imagine, with new urgency and I think a
7 new spotlight in the context of what we are seeing out of
8 our Russian Elites, Proxies, and Oligarchs work and the
9 international task force that we have created in support of
10 that, as well as consistent with the strategy on countering
11 corruption that the administration put out last year.

12 The Chairman. No doubt whatsoever that the key
13 gatekeepers should be covered?

14 Mr. Nelson. And one of the things that we are doing,
15 I think as you are aware, we have the authority to issue
16 regulations to extend BSA obligations to investment
17 advisers. So that is something that we are actually
18 looking at in terms of a new rulemaking.

19 The Chairman. Well, I would encourage you to proceed
20 with vigor and dispatch.

21 Ambassador Robinson, same question.

22 Ambassador Robinson. I totally agree with my
23 colleague at Treasury. We think it is important to go
24 after the middlemen, the enablers. The administration's
25 executive order, expanding on the Kingpin Act, allows us to

1 do that, and we are all for it.

2 The Chairman. Great. Well, we will continue to try
3 to provide you the authorities and the resources you need.

4 I will close with where I began, which is that I think
5 that the international dark economy, as a network, as a
6 piece of infrastructure, is a very dangerous thing. It
7 enables conduct that is antithetical, anathema even, to our
8 values and to our national security. And yet a
9 considerable number of American and other rule of law
10 country professionals engage in this conduct because we
11 have not stopped them.

12 And in that sense, we, the rule of law countries, are
13 giving aid and comfort to our enemies in a clash of values
14 that often results in actual kinetic harm in places like we
15 are seeing it in Ukraine right now, but there are many
16 other places where a lot of cruelty and violence takes
17 place because this conduct is facilitated by our side of
18 the rule of law versus non rule of law world.

19 So thanks very much for your efforts to fight this
20 from the front lines, and we will try to keep sending you
21 authorities and resources.

22 Mr. Nelson. Thank you so much.

23 Ambassador Robinson. Thanks, Senator.

24 The Chairman. The hearing is concluded. My virtual
25 gavel falls, and anybody who has any questions will have to

1 file them as questions for the record, and we would ask you
2 to respond promptly to them when as and if received.

3 Thanks very much, both.

4 Ambassador Robinson. Thank you, Senator.

5 Mr. Nelson. Thank you.

6 [Whereupon, at 2:51 p.m., the caucus was adjourned.]

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