Corruption in CBP
A Retrospective Study of Cases

U.S. Customs and Border Protection

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LEADERSHIP MESSAGE

Public interest and the demand for professional accountability in law enforcement has never been greater. As the largest law enforcement agency in the country, with a border security and international trade mission, U.S. Customs and Border Protection (CBP) has been the subject of significant public discourse, at times drawing criticism for its record of accountability and transparency.

In February 2016, with the enactment of the *Trade Facilitation and Trade Enforcement Act (TFTEA),* Congress established an Office of Professional Responsibility (OPR) in CBP. Later codified under 6 U.S.C. Section 211, the law charged OPR with investigating criminal and administrative matters and misconduct by officers, agents, and other employees of CBP, managing integrity-related programs and policies of CBP, and conducting research and analysis regarding CBP employee misconduct.

As in any large organization with tens of thousands of employees, misconduct in CBP spans a wide range of activity. OPR's Integrity Assurance Program (IAP) studies the entire spectrum from traveler complaints of rude and discourteous behavior to public corruption. Recently, to promote greater organizational transparency, CBP began publishing annual fiscal year (FY) reports regarding internal investigations and discipline, including criminal and administrative case summaries and associated penalties.

While yearly snapshots of misconduct investigations and employee discipline provide useful insights, CBP is also committed to conducting research and analysis to identify trends or operational vulnerabilities exposed in corruption investigations. Although instances of corruption in CBP are rare, involving just a fractional percent of the workforce, a single corrupt act of commission or omission by a CBP employee could have significant national security implications in a post 9/11 environment.

This report is the product of a multi-year study of corruption in CBP and includes detailed information on its nature and prevalence in the workforce. The results of the study have informed CBP's continuously evolving efforts to prevent, detect, and investigate corruption, and raise employee awareness. While we share these results now, investigators and analysts diligently pursue and dissect recent cases. Efforts to identify emerging corruption trends and implement effective countermeasures will always be an institutional priority for CBP.

Matthew Klein
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INTRODUCTION

Created in the aftermath of the 9/11 terror attacks as part of the Homeland Security Act of 2002, CBP is the first unified border agency in the United States combining customs, immigration, border security, international trade, and agricultural protection into one coordinated activity. With over 60,000 employees and nearly 45,000 sworn law enforcement officers, CBP is the largest law enforcement agency in the United States.

Mission: Protect the American people, safeguard our borders, and enhance the Nation's economic prosperity.

Vision: Enhancing the Nation's security through innovation, intelligence, collaboration, and trust.

Core Values: Vigilance, Service to Country, and Integrity.

In its relatively brief history, CBP has successfully performed its mission to protect the American people, safeguard its borders, and enhance the Nation's economic prosperity. Yet, while performing this complex mission, CBP has been criticized for its record on organizational accountability, integrity, or transparency. Recently, however, CBP has made strides to improve in these areas, including the creation of a publicly accessible Accountability and Transparency web page detailing multiple avenues to report incidents and providing timely and accurate information regarding CBP-related deaths, use of force incidents and other critical incidents resulting in serious injuries. The Accountability and Transparency page provides the public with statements, policies, reports, and other important information concerning critical incidents, employee arrests and discipline, and related OPR reviews and investigations.

The importance of maintaining public trust and confidence in CBP cannot be overstated. The American people have placed their trust in the men and women of CBP to safeguard our borders and enhance the nation's economic prosperity. Yet, like border security and law enforcement agencies worldwide, CBP is vulnerable to corruption which, if not detected and effectively investigated and addressed, could harm its mission, and undermine public trust.

Expectations for Conduct

Working in CBP comes with a solemn responsibility to keep terrorists and their weapons out of the U.S., while facilitating lawful international travel and trade. The American people expect CBP employees to serve with integrity and professionalism.

CBP employees must be guided by the highest ethical and moral principles and are expected to exhibit the highest levels of professional responsibility and conduct both on and off duty. **The Standards of Ethical Conduct for Federal Employees**, as outlined in 5 C.F.R. § 2635, establish expectations for their service.

1. Public service is a public trust; employees must place loyalty to the Constitution, the laws, and ethical principles above private gain.
2. Employees shall not hold financial interests that conflict with the conscientious performance of duty.
3. Employees shall not engage in financial transactions using nonpublic Government information or allow the improper use of such information to further any private interest.
4. Employees shall not, except as permitted by the Standards of Ethical Conduct, solicit, or accept any gift or other item of monetary value from any person or entity seeking official action from, doing business with, or conducting activities regulated by the employee's agency, or whose interests may be substantially affected by the performance or nonperformance of the employee's duties.
5. Employees shall put forth honest effort in the performance of their duties.
6. Employees shall not knowingly make unauthorized commitments or promises of any kind purporting to bind the Government.
7. Employees shall not use public office for private gain.
8. Employees shall act impartially and not give preferential treatment to any private organization or individual.
9. Employees shall protect and conserve Federal property and shall not use it for other than authorized activities.
10. Employees shall not engage in outside employment or activities - including seeking or negotiating for employment - that conflict with official Government duties and responsibilities.
11. Employees shall disclose waste, fraud, abuse, and corruption to appropriate authorities.
12. Employees shall satisfy in good faith their obligations as citizens, including all financial obligations, especially those imposed by law, such as Federal, state, or local taxes.
13. Employees shall adhere to all laws and regulations that provide equal opportunity for all Americans regardless of race, color, religion, sex, national origin, age, or handicap.
14. Employees shall endeavor to avoid any actions creating the appearance that they are violating the law or the ethical standards set forth in the Standards of Ethical Conduct. Whether particular circumstances create an appearance that the law or these standards have been violated shall be determined from the perspective of a reasonable person with knowledge of the relevant facts.

They must also abide by the **CBP Standards of Conduct** that provide specific guidance on the following activities:

- Conduct prejudicial to the government
- Prohibited actions
- Integrity related misconduct
- False statements
- Disclosure and safeguarding of official information
- Use of controlled substances
- General conduct
- Care of money and property
- Use of government property and other resources
- Use of alcoholic beverages
- Bias-motivated conduct
- Gambling
- Financial matters
- Safety
- Outside/Family member employment
- Political activity

This report provides the findings of a comprehensive study of corruption in CBP. It includes detailed information on the nature and prevalence of corruption in the workforce derived from information and records developed and maintained by CBP's OPR. It also includes a section highlighting OPR's multiple, concurrent approaches for preventing corruption including enhancing applicant vetting protocols; leveraging staffing and infrastructure investments; expanding collaboration with law enforcement partners; and utilizing operational, educational, and technological solutions to meet the latest threats to CBP's culture of integrity and accountability.

Defining and Studying Corruption

The vast majority of CBP employees exemplify these ideals and adhere to these Standards of Conduct. However, a small subset of CBP's 64,000 workforce failed to meet these standards. They engaged in criminal activity that involved the misuse of their official position for personal gain, thus they engaged in **corruption**. They used the knowledge, access, or authority granted by virtue of their official position to personally engage in criminal activity or to facilitate the criminal activity of others. In exchange, they received material and non-material benefits or advantages such as money, goods, services, power, influence, or relationships.

CBP intentionally defines corruption in broad terms to encompass all criminal activity perpetrated with a

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CORRUPTION
Criminal activity involving the misuse of official position for personal gain

Typical Activity:
Providing sensitive information to criminal organizations
Facilitating smuggling of drugs and humans
Harboring undocumented noncitizens
Committing fraud
Querying law enforcement databases for unofficial purposes
Stealing property and funds

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nexus to CBP employment, rather than focusing on specific types of activity or certain geographic locations such as drug smuggling at the Southwest Border. In total, corrupt employees comprise one quarter of one percent (**0.025 percent**) of the CBP workforce, but the impact of their actions and subsequent arrests have had significant and damaging implications for CBP's reputation, ability to execute its mission, and on employee morale.

Commonly held beliefs on corruption in CBP tend to be based on anecdotes of individual cases, either because the employee was well known in a particular operational area of responsibility, or the case attracted significant media attention. These narratives come together to form assumptions about what corruption is, where it occurs, the types of employees who engage in this type of criminal activity, whether there are ways to prevent it, and how the activity is brought to attention of investigators. For instance, anecdotes suggest:

- U.S. Border Patrol Agents (BPA) and Customs and Border Protection Officers (CBPO) either infiltrate CBP with the express intent of engaging in criminal activity or are recruited by Trans-national Criminal Organizations to do so.
- They were hired during a specific period and are of a certain age demographic.

- They facilitate drug and human smuggling exclusively at the Southwest Border by failing to perform a function of their inspection or enforcement responsibilities.

To some extent, these assumptions may offer some insights, but the degree to which they represent the actual nature of corruption was not fully understood.

Accordingly, behavioral science researchers and analysts in OPR's IAP conducted a comprehensive study of corruption, examining **173** cases[1] where CBP employees were **convicted or entered guilty pleas** for engaging in criminal activity that involved the misuse of their official position for personal gain. The study was a systematic review of all cases[2] describing commonalities among the employees and the situations in which they operated, with a focus on behavior. It also included a series of interviews conducted with co-workers and supervisors of a subset of corrupt employees. The purpose of the study was to provide greater understanding of the nature of corruption in CBP. The findings are discussed herein.

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[1] They were full-time employees at the time of their arrest or indictment which occurred between October 1, 2004 and September 30, 2017. All of the cases were fully adjudicated in the courts by November 2018.
[2] A description of the study method and limitations can be found in Appendix A.

Study Results: Corruption by the Numbers

Corruption:
Criminal activity involving the misuse of official position for personal gain

173 — Employees examined in the study; convicted or entered guilty pleas for corruption related activity

Types of Activity

- Drug smuggling
- Money laundering
- Misuse of government IT systems
- Noncitizen smuggling
- Fraud
- Theft

120 — Cases involving illegal activity in direct opposition to the CBP mission with implications for border security and national security; violations of the laws CBP is charged to enforce

69 Posts of Duty

19 States

39 yrs. Average age at the time of arrest

9.5 yrs. Average years of service at the time of arrest

156 90% **Male employees**

159 92% **Border Patrol Agents and Customs and Border Protection Officers**

15 9% **Supervisors**

127 73% **Coordinated with Others**

156 91% **Planned their activity**

124 72% **Took an active role in the corruption scheme**

111 64% Sentenced to prison time for their offenses (Sentences ranging <1 year to 70 years)

$3 Million Total amount of fines, special assessments, and restitution employees ordered to pay

24% Faced disciplinary action up to, and including removal

76% Left CBP while under investigation; disciplinary action not applicable

Key Findings

Corruption involved a wide variety of criminal activity, most of which was in direct opposition to the CBP mission and the laws CBP enforces.

The employees committed several types of illegal activity. They used their positions to commit crimes related to drugs and noncitizens, theft, fraud, and improper use of government IT systems. Figure 1 shows the distribution of cases by type of activity.

51%

Smuggling
Illegal movement of drugs, noncitizens, and other contraband into the country

17%

Theft
Stealing of funds and property of the U.S. government and the public

13%

Fraud
Intentional deception to gain an advantage. Document fraud, bank fraud, time and attendance fraud

10%

Systems Misuse
Querying government IT systems for non-official purposes

5%

Harboring
Hiding or providing safe haven for persons in the country illegally

3%

Weapons
Illegal purchases of firearms

1%

Release of Information
Sharing law enforcement sensitive information with those who do not have a need to know

Figure 1 Corruption Cases by Type of Activity

Corruption differed according to the type of criminal activity perpetrated and the situation in which it occurred. Most of the cases involved activity that compromised the CBP mission, whereas the others involved less significant offenses.

In **69 percent** of the cases, corrupt employees engaged in **mission compromising corruption,** illegal activity conducted in direct opposition to the CBP mission. Their actions had implications for national security, border security, and they violated the very laws CBP is charged to enforce. They were involved in drug and human smuggling, made straw purchases[3] of weapons, provided safe harbor and/or immigration documents to undocumented noncitizens, queried government IT systems including those containing law enforcement sensitive information and shared the results of those queries with criminal organizations.

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[3] A criminal act in which a person purchases a firearm on behalf of another who is legally unable to make the purchase themselves.

The remaining **31 percent** of cases involved **petty corruption,** defined herein as illegal activity, which resulted in some form of personal gain but did not have the same broader implications as mission compromising corruption. These cases were unique to the individual employee and were typically related to a personal situation. Employees capitalized on opportunities and stole government property, cash, and the property of the traveling public. A substantial portion of employees engaged in several types of fraud by filing fraudulent workers' compensation claims, travel vouchers, and time/attendance records. Some engaged in housing and mortgage fraud by receiving special reduced interest rates offered to law enforcement officers but violated the conditions by failing to establish the property as a primary residence. Several others used their access to law enforcement information contained in government IT systems to query individuals known to them, either to obtain influence over these people, additional information to satisfy a curiosity, or to gain advantage over opponents in civil litigation. Employees across the two types of corruption shared many common behaviors and attributes. Subsequent findings describe employees in both types of corruption, unless otherwise specified.

Mission Compromising Corruption	Petty Corruption
A BPA assigned to Calexico, California smuggled marijuana while on duty at the border and dressed in full uniform. He accepted ten duffle bags containing 650 pounds of marijuana from his co-conspirators and placed them in his Border Patrol vehicle. He was apprehended by other BPAs who observed the activity. The BPA was sentenced to five years in prison and ordered to pay $5,000 in fines.	Over nearly a 1-month period, a 56-year-old CBPO assigned to Nogales, Arizona, stole $2,347 in fees collected by CBP for immigration permits. He also knowingly filed false Interim Transmittal Reports at the conclusion of his shifts. He was convicted of 1 count of theft of public money and 26 counts of false statements. The CBPO was sentenced to 3 years' probation and ordered to pay over $5,000 in fines and restitution.

Corruption took place in locations throughout the United States and in foreign posts, not just at the Southwest Border.

The employees were assigned to **69** different duty locations in **19** states, the District of Columbia, and 3 foreign countries. The highest incidence of corruption occurred along the Southwest Border. However, employees also engaged in corrupt activity while assigned to many other duty locations away from the border. The locations of these cases indicates that corruption is not just a Southwest Border phenomenon, rather it can happen anywhere CBP operates. Figure 2 depicts the highest number of cases by state.

Texas	California	Arizona	Florida	New York	Michigan
57	32	28	11	7	6
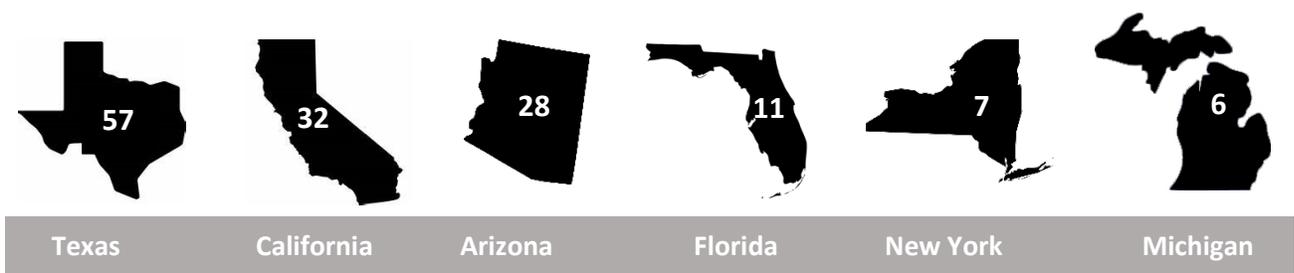
Figure 2 Highest Case Counts by State

Figure 3 illustrates the highest case counts concentrated in operational areas of responsibility for both the Office of Field Operations (OFO) and the U.S. Border Patrol (USBP). Laredo had the most cases at 29, followed by Tucson, San Diego, El Paso, Miami, Rio Grande, and Detroit. These operational areas of responsibility have large concentrations of personnel assigned, in line with operational demands.
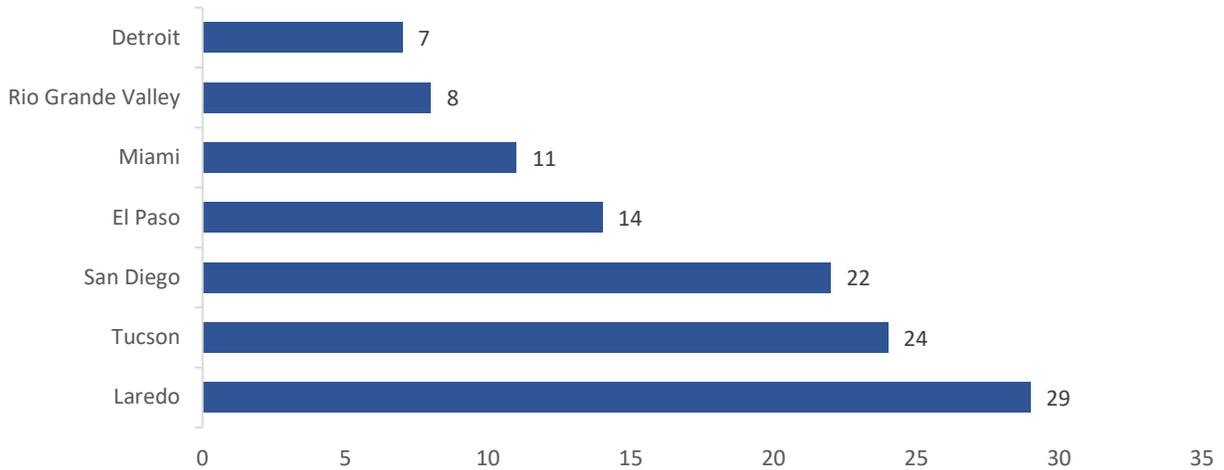
Figure 3 Highest Case Count by Operational Area

While most of the corrupt employees worked in front line law enforcement positions, they did not fit one descriptive or demographic profile.

Both men and women who varied in age, job assignments, time in service, pay grade, and supervisory status were convicted of criminal activity involving corruption.

90% male / 10% female
156   17

Age range	43 years
Youngest	22 years
Oldest	65 years

Nearly 90 percent of employees were 30 years of age and older at the time of arrest.
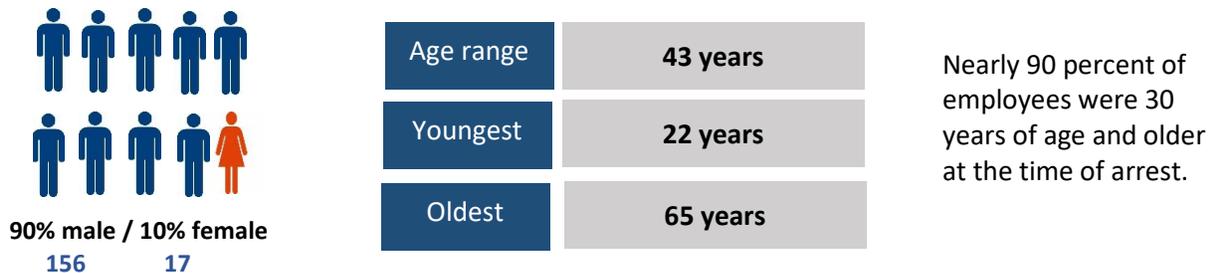
Figure 4 Gender and Age of Employees

The Youngest	The Oldest
A 22-year-old CBPO accessed a law enforcement database to provide information to an individual he believed to be a narcotics trafficker and assisted vehicles believed to be transporting narcotics through the Calexico, California, Port of Entry. He also knowingly aided and abetted the importation of at least 5 kilograms of cocaine in exchange for bribe money. He pleaded guilty to the charges and was sentenced to 3 years' imprisonment.	A 65-year-old CBPO, with 20 years of service, conspired with another CBPO to clear shipments of hashish and other contraband into the U.S. through JFK International Airport. In exchange, he received tickets to sporting events and rounds of golf. He was sentenced to 3 years' probation and was ordered to pay $5,000 in fines and restitution.

They worked in a variety of workplace settings and performed various types of duty responsibilities.

Land Ports	Sea Ports	Airports	USBP Stations

Checkpoints	Garages	Headquarters

Nearly all (**98 percent**) were assigned to **OFO** or **USBP**, two of the three CBP operational law enforcement components. In total, they worked in **11** different occupations. Most worked as front-line law enforcement officers in operational roles securing the border, where they had the most opportunity to misuse their official positions to facilitate illegal activity such as drugs and human smuggling or releasing law enforcement sensitive information to criminal organizations.

58%	Customs and Border Protection Officers
34%	Border Patrol Agents

92%
Law enforcement officers

Figure 5 Cases by Occupation

However, a small percentage of employees worked in other types of positions performing administrative and technical work. Employees working in these occupations typically engaged in petty corruption, capitalizing on their access or knowledge to commit fraud or theft.

Mission Support Specialist   Auto Mechanic   Law Enforcement Communications Specialist   Management Analyst

The complexity and compensation of the employees' positions varied as they worked at various levels on the General Schedule (GS), the Office of Personnel Management's (OPM) classification and pay schedule system. The GS scale has 15 grades, from GS-01 to GS-15 and is based on the level of difficulty, responsibility, and qualifications required for government occupations. Employees advanced to higher levels by promotion at certain intervals.

At the time they were arrested, the corrupt employees worked in entry level positions at the GS-5 level, mid-level positions at GS-9 and GS-10, and subsequent levels up to and including the GS-14. Nearly half (51 percent) worked at the GS-11 level. **Fewer than 10 percent** were in supervisory positions at the time of their arrest.

The time they worked for CBP also varied, spanning 32 years overall. They began their service with CBP or one of its legacy agencies[4] between **1977** and **2012.**

At the low end, some corrupt employees had been employed for less than 1 year at the time they were arrested, while at the other extreme, another employee had been on the job for 33 years. **Seventy One percent** (112) had served more than 5 years at the time of their arrest.

Time	Count
0-5 yrs.	51
6-10 yrs.	60
11-15 yrs.	27
16-20 yrs.	25
21-25 yrs.	9
26-30 yrs.	0
31-35 yrs.	1
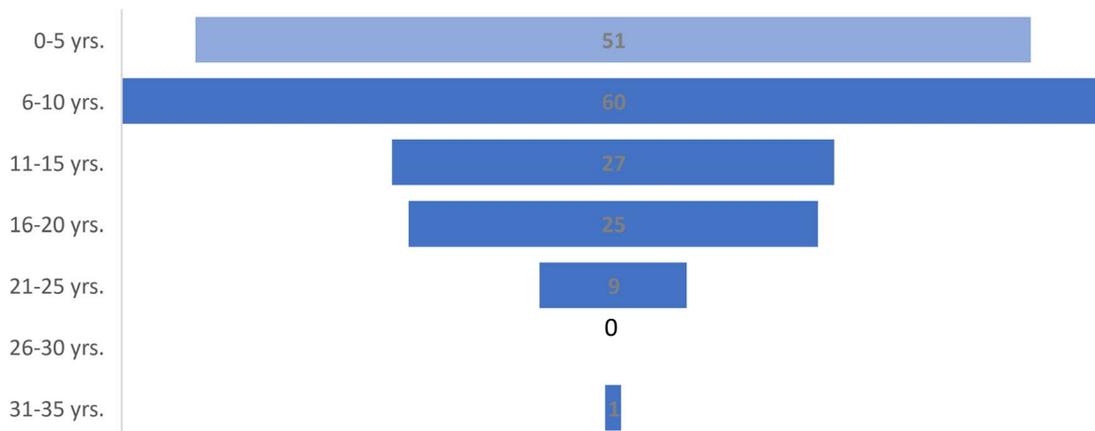
Figure 6 Employees' Time in Service with CBP

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[4] Legacy agencies are the agencies merged to form CBP with the creation of the Department of Homeland Security in 2003. They include the former U.S. Customs Service, Immigration and Naturalization Service, USBP, and agriculture inspectors from the U.S. Department of Agriculture.

Corrupt employees had a history of allegations of misconduct and corruption. Many were reported to OPR or other law enforcement agencies prior to the allegation that led to their eventual arrest.

They were the subject of **743** total allegations in OPR's Joint Integrity Case Management System (JICMS); **328** were allegations of corrupt activity such as human smuggling, bribery, and releasing information and the remaining **415** were allegations of other types of misconduct such as unprofessional and rude conduct, conduct unbecoming an officer, timecard irregularities, driving under the influence (DUI) and domestic violence arrests, alleged noncitizen and detainee abuse, absent without official leave (AWOL), and damaging a government owned vehicle.

- **44 percent** of corrupt employees were the subject of multiple allegations of corrupt activity.
- **71 percent** of corrupt employees were also the subject of multiple allegations of other types of misconduct.

In some instances, these employees received disciplinary and adverse actions for other types of offenses. Some allegations were unsubstantiated, and the cases were closed.

A Gut Feeling
A BPA from the Tucson Sector began engaging in corrupt activities within the first year of his employment with CBP. In exchange for bribes, he provided a detailed list of sensor locations in the Sonoita, Arizona, area to a drug trafficker. A supervisor stated he had a gut instinct about the BPA and felt something was wrong from their first encounter. The supervisor was not surprised when hearing about the agent's arrest.

These were high, low, and average performing employees.

In interviews with co-workers and supervisors, researchers found that the corrupt employees' reputation, work ethic, and performance varied.

Some of the employees were highly regarded by their peers and described as star performers and model employees. They worked in specialized assignments and possessed highly specialized skills and expertise in languages, counterterrorism, immigration law, training, and mentoring. They went above and beyond to accomplish the mission. These employees appeared to exploit their good reputation and status to facilitate corrupt activity. They volunteered for additional shifts, provided food to occupy fellow officers during slow times, and distracted others during inspections by telling jokes or flirting with co-workers and travelers.

Employment records indicated that **36 percent** of the employees received cash awards totaling over **$200,000** and over **232 hours** in time off awards over the course of their careers with CBP. Over half received the cash and time off awards in the 2 years prior to their arrest or indictment at the same time they were under investigation.

Others were considered average employees who did just slightly more than the minimum to get by. They did their jobs, but typically did not volunteer for overtime or special assignments. Co-workers perceived them as laid back, but not disgruntled or corrupt.

Interviewees described employees as sub-par performers who did not actualize their abilities or potential. They also described having "gut feelings" and "gut instincts" about their peers that something just wasn't right.

In all, the arrest of some employees came as a shock to their co-workers and supervisors. They never suspected or had any inclination that these individuals were engaging in criminal activity. Their notions proved to be inaccurate or completely contrary to their behavior. For other employees, their arrest confirmed long held suspicions, intuitions, and gut feelings that something was not quite right. We cannot generalize or assume employee misconduct is based on reputation or performance. Some appear to have leveraged positive reputations to facilitate corrupt activity.

The Star Performer

A CBPO was sentenced to 5 years in prison for his involvement in a noncitizen smuggling operation. The 44-year-old former Marine pleaded guilty to guiding undocumented noncitizens through his primary lane for cash payments. Court documents described wiretaps that recorded him speaking to smugglers in coded language to discuss what time to cross and which lane to use. He would then deliberately fail to record the vehicles containing undocumented noncitizens when they came through the port.

According to co-workers, the officer was a knowledgeable employee who knew operations very well having worked in land border, cargo, and in passenger operations assignments. He was considered a "go-to" employee who mentored new officers, provided instruction on how to properly inspect vehicles, and how to handle people who may be dangerous. He was friendly with everyone and was always willing to assist. He capitalized on this reputation and manipulated colleagues and supervisors into believing that he was working hard and shouldered some of their workload. He deliberately worked midnights and double shifts to ensure his loads got through. He gained his colleagues' trust to the point that some took out second mortgages to help him post his bail. In addition to his prison sentence, he was also fined $200,000 and given 3 years of supervised release.

Employees became involved in corruption in different ways. Some were recruited by criminal organizations, others self-initiated.

Understanding how employees got involved in corruption is a key factor in prevention. However, information is limited because typically investigations focus on what the employee did, not why or how they started.

Employees who engaged in petty corruption (53 of the 173 employees in the study) typically self-initiated and acted alone. They had a need and capitalized on their access, status, or authority to satisfy that need. They devised schemes to defraud the government by falsifying information on applications or time and attendance records, stole money or property, or queried law enforcement databases to extract information on or for associates or family members.

Those who engaged in mission compromising types of corruption (120 of the 173 employees in the study) took different paths, often working closely with others:

	Of the 120 mission compromising corruption cases:
56	**Employees self-initiated**
45	**Employees were recruited in place**
5	**Employees infiltrated CBP to facilitate criminal activity**
14	**Initiation undetermined due to lack of information in investigative reports**

Common situations:
- Family members and close associates recruited employees, asking them to use their positions to facilitate criminal activity.
- Employees who self-initiated offered their "services" in support of a criminal enterprise.
- Some needed money to pay bills or fund a lifestyle.
- Others seized an opportunity.

Of the 120 employees who engaged in mission compromising types of corruption, 110 (92 percent) coordinated with others. They conspired with family members and even individuals they listed as personal references in their background investigations. Nearly a third conspired or coordinated their illicit activity with other CBP officials or law enforcement personnel affiliated with other federal, state, or local law enforcement agencies.

Moreover, 72 of these employees were in "hometown duty" assignments where they worked 60 miles or less from the city in which they grew up. Such assignments had benefits and risks. They were familiar with the terrain, the local culture, and the people. But they could find themselves in situations where they had to choose between enforcing the law and the interests of family or friends. This risk was amplified if their associates were engaged in criminal activity. In most of these cases, their co-conspirators lived in the same hometown and were family members, colleagues, school mates, and friends.
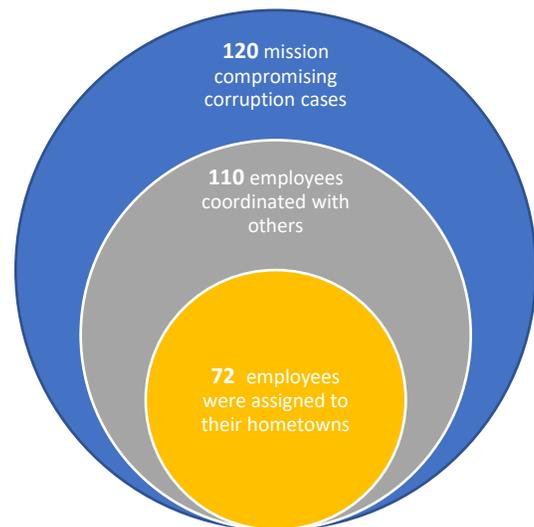
Figure 7 Mission Compromising Corruption Cases

Corrupt employees carefully planned their schemes to avoid detection and achieve optimum success.

Most engaged in corrupt activity during work hours while performing official duties. Some continued their illicit activity after work to complete delivery of goods, provide information, coordinate future operations, and collect compensation.

Ninety-One percent planned their activity. Planning included meetings with conspirators outside of work, providing work schedules and lane assignments, setting the timing of a drug load coming through a port of entry to coincide with low activity or low traffic, signaling smugglers via text, cell phone calls, and two-way talk radios. Those who appeared to act spontaneously primarily seized an opportunity and stole items or cash or tried to intervene during inspections.

Seventy-One percent took steps to conceal their activity. They used code words, met with conspirators in Mexico, established alibis with other CBP personnel, convinced other employees to conduct queries in systems, and deliberately passed loads of drugs or noncitizens during overnight shifts when volume and staffing levels were lower. They conducted illegitimate queries of law enforcement systems amongst routine queries or used multiple ways to look up certain types of information. They also used social engineering to distract and provide alternate explanations for what they were doing.

Corrupt employees took both active and passive roles in the corrupt activity.

Most took active roles, operating central to the illicit scheme. Most perpetrated criminal activity involving laws that CBP is charged with enforcing, such as transporting illicit drugs across the border, harboring noncitizens in their homes, stealing blank immigration forms, releasing sensitive information, falsifying documents, making false statements, and even releasing undocumented noncitizens into the U.S. In these instances, the employees knowingly and willingly participated. Those who engaged in petty corruption were the central actors in the scheme—stealing property belonging to the government or the traveling public, making fraudulent claims for benefits or querying law enforcement databases for other than official reasons.

The employees involved in mission compromising corruption exhibited specific enabling behaviors. They:

- **Intervened, deliberately interrupting a process, or affected an outcome to facilitate illegal activity.** The employees interfered in the inspection process and redirected vehicles to specific lanes at ports of entry. They entered false information and manipulated existing entries in law enforcement databases. They deliberately interrupted an enforcement action or alert by disabling or clearing sensors that had alerted to activity. They also manually overrode alerts from vehicle license plate readers. Some redirected vehicle maintenance work to certain vendors involved in their illicit scheme.

- **Guided criminal conspirators by providing information, direction, equipment, consultation, and tools to individuals interested in defeating CBP processes.**

  They advised smugglers on what to do if stopped by USBP or if sent to secondary inspection, how to conceal narcotics in vehicles, avoid canine detection and prevent vehicle license plates from registering a clear image in plate readers. They also provided sensitive details on CBP enforcement operations including work schedules, lane assignments, code words, identities of confidential sources, locations of sensors, and force movements along the Southwest Border. Some even provided CBP uniforms, hats, badges, and binoculars as well as combinations to gate locks.

Guiding and Assisting
A CBPO was sentenced to 22 years in federal prison, 2 years supervised release, and a $7,500 fine after pleading guilty to 1 count of noncitizen smuggling and 1 count of bribery. A year-long investigation produced evidence that the officer was facilitating the smuggling and transporting of undocumented noncitizens in exchange for bribe money. He shared sensitive information with drug smugglers about border operations, even suggesting what types of vehicles worked best to conceal drugs and people. He also allowed noncitizens to pass through his lane without inspection and conducted unauthorized queries of his girlfriend in a law enforcement database.

- **Persuaded others by distracting or manipulating co-workers to affect an outcome in support of illegal activity.**

  They redirected officers to other locations in the inspection areas to distract them from narcotics loaded vehicles. They continued to work a shift as usual while operating a USBP vehicle loaded with drugs. They flirted with co-workers, told jokes, and introduced other distractions such as food and movies to divert attention while drug loads came through the port of entry. They misrepresented situations seeking assistance from co-workers.

Persuading Co-workers
A Law Enforcement Communications Specialist was considered a competent, professional dispatcher. Recalling her conduct and reputation, a co-worker said that he felt safe with her and often thought, "thank God she's our dispatcher today." The dispatcher manipulated agents into disclosing information about operations by asking seemingly innocuous questions about their schedules and overtime and whether they were patrolling in a certain area. She shared this information with drug smuggling organizations in exchange for money. She was convicted and sentenced to prison.

- **Took a more passive approach through omission, failing to perform job duties or willful negligence.**

  They failed to inspect or pretended to inspect vehicles and passengers, simply allowing travelers to pass through their lane. Others skipped steps in the inspection process or failed to enter passenger information in law enforcement IT systems. They also failed to correct erroneous entries, faulty readings of license plate readers, and ignored alerts on passengers.

Corrupt employees benefitted from their actions, but their true motives are unclear.

All of the employees received some sort of benefit or personal gain for their actions. They received financial compensation, material goods and services, and reduced rates. They also received other types of benefits including sexual relations, status, favor, information, advantage, and friendship.

Fifty-Eight percent received money in exchange for their role in the illegal activity. The exact amount of financial compensation is not known in each case. However, we estimate corrupt employees received as little as $90 and as much as $1.5 million for their actions.

Thirty percent took an active role and negotiated the type of compensation or the amount of money they received. Often, this negotiation was based on the type of activity the employee needed to perform, such as passing loads of drugs or querying information in a law enforcement database. They set their price based on the type of narcotics the smugglers were attempting to bring into the country (e.g., cocaine or heroin vs. marijuana), the number and type of weapons they were to purchase, or the country of origin (e.g., Mexico vs. other South American countries), the gender, and age of the undocumented noncitizens.

Many took steps to conceal the compensation. They requested material goods rather than cash payments to avoid having to deal with financial institutions. Some hid cash, weapons, and other items of value in their homes. If they had to accept cash, the employees would break it up and deposit smaller amounts to avoid raising suspicion with the bank. They had elaborate cover stories to explain their affluence. They claimed their spouse had a successful business or profession to explain luxury vehicle purchases or vacations, or even registered vehicles in other people's names. They even went so far as maintaining a modest home in the U.S. while also owning an extravagant home in Mexico.

It is difficult to discern why they engaged in corrupt activity, but key life factors may play a significant role. Absent the ability to ask the employees directly, researchers relied upon information in investigative reports and key life factors identified as part of the background investigation process to ascertain insights regarding motives. Even still, some may argue that employees were ultimately motivated by financial gain because they did receive payment for their actions. While true, there may also be intrinsic factors in play as well. The money does not alleviate the situations or stressors they were experiencing. Forty Two percent reported circumstances in their pre-employment or subsequent background investigations that can be considered stress-provoking which may have influenced their decision to engage in corrupt activity including illness, gambling debts, drug and alcohol dependency, financial difficulties, relationships issues, and court proceedings. Many appeared to have confronted a loyalty challenge in which they had to choose between their family and friends and their duty to uphold the law.

None of these key life factors, personal conduct, or the claims of others rose to a level of severity that rendered the employees unsuitable in pre-employment screening or subsequent reinvestigations. In many cases, the issue was mitigated by time and/or evidence to suggest that the individual had taken steps to reconcile the issues or had no other incidents of undesirable behavior. Furthermore, many other CBP employees may share these life issues but do not engage in corruption. These factors, may, however, point to pressure points or stressors that taken in context may have played a role in an employee's pathway to corruption. Without the coping mechanisms in place that are needed to manage and mitigate these key life factors and stressors, employees may not see a way out and may look for other ways to solve these problems. Some may succumb to recruitment into corrupt activity, others may self-initiate.

Other CBP employees had suspicions about these employees, some observed concerning behaviors.

In interviews with researchers, co-workers and supervisors reported seeing and hearing things about the corrupt employees' off-duty activities, unexplained affluence, travel to Mexico, luxury vehicles and new homes.

Co-workers and supervisors told researchers they saw and heard things about the employees' lifestyle and activities outside work which raised suspicion or caused concern. They often heard about the employees off duty exploits in Mexico attending parties and going to bars and clubs that were widely known to be places frequented by smugglers and cartel members. Some of the employees were suspected of living in Mexico (despite policies prohibiting it) and would return to the U.S. hours before their shifts began. Other employees were known to have had numerous extra marital affairs, some with women known to be connected to the drug and human smuggling cartels. Many recalled that the employees appeared to be living beyond their means, given the salary rates for the area. They would arrive at work driving luxury vehicles, wore expensive clothing, took frequent extravagant vacations, and reportedly owned expensive houses. A few owned side businesses that could potentially explain the additional income, but for the most part the possessions and lifestyle appeared inconsistent with government compensation and could not be explained.

Risky Behavior
Two supervisory Border Patrol agents released individuals acting as scouts for cartels back to their smuggling organizations for a price, rather than turning them over to the Mexican government for prosecution. A former colleague of one of the supervisors reported that the supervisor was known to be a womanizer and had several extra-marital affairs over the years. He lived with his family in Mexicali, Mexico, and was also known to frequent pool halls whose patrons included known drug and noncitizen smugglers.

Co-workers interviewed also observed stress in employees, accompanied by changes in attitude, work ethic, presentation, and behavior. In one noteworthy case, co-workers described an officer as "enforcement minded…really into the job…somebody you could count on" before he experienced a contentious divorce and child custody fight. He was frequently on the telephone during work hours and co-workers overheard heated arguments he had with his ex-wife. The situation was so uncomfortable, the co-workers would get up and leave the room. Under a great deal of stress, his performance suffered and according to co-workers, he just "checked out." The officer began using his access to sensitive law enforcement databases to query his ex-wife and others- reportedly her new boyfriend- hundreds of times. Co-workers said that he talked about his mounting stress, but no one really did anything to support him; they just ignored it. They noted, in retrospect, he would have benefitted from someone encouraging him to seek help through the Employee Assistance Program. Employees facing these types of stressful situations can also be vulnerable to corruption, either to gain advantage in a personal situation or to coercion or blackmail at the hands of Transnational Criminal Organizations.

Throughout the interviews, some co-workers also talked about taking steps to mitigate actions of subjects who were widely suspected of being corrupt. They roamed lanes when the subject was working primary and sent K-9 teams for additional searches. Others attempted to intervene by inserting or adding scrutiny or additional oversight to the subjects' operations. Some even confronted the subject

about corrupt activity. But none of the supervisors or co-workers' researchers interviewed[5] made allegations to the Joint Intake Center (JIC). They had information that could have been useful for investigators and may be indicative of corrupt activity. They recognized that these things were odd, or unusual, but did not think it rose to the level of an allegation of misconduct. However, once the employee in question was arrested, it confirmed their worst fears and suspicions.

Few allegations of corruption are reported directly to CBP OPR.

Investigators learned of the corrupt employees alleged corrupt activity primarily through external sources. Most cases (59 percent) were initiated based on information or tips provided by informants or the CBP employee was identified in another law enforcement agency's investigation. Some cases originated from members of the public who witnessed the criminal activity, knew the employee or were the victim of the criminal activity. A small percentage of cases were identified through proactive detection programs including targeted OPR integrity testing, proactive data analysis, and network systems monitoring. This demonstrates the value of increased collaboration and cooperation with investigative partners as well as developing robust proactive detection methodologies.

However, more work must be done to raise employee awareness. Despite being best positioned to observe criminal activity, concerning behavior or suspicious activity of their co-workers, just **20 percent** of all cases originated when a CBP employee filed an allegation of misconduct. In most of these instances, the allegation involved some sort of suspicious activity. In a few cases, the employee witnessed the criminal act and reported it immediately. The lack of employee reporting aligns with what co-workers shared in the study interviews-they observed concerning or suspicious activity but did not report it to investigators. CBP employees have the greatest insights on their peers and are highly trained to spot criminal activity. The ability to detect corruption could increase significantly if employees combined both of these skills and then acted on it, reporting to OPR. OPR needs a clearer understanding of why employees have information that could be useful for investigators but do not report.

Corruption had significant impact on the agency and real-life consequences for the employees.

Corruption in CBP is a rare event. The employees studied here represent less than 1 percent of the CBP workforce. However, the impact of these cases is immeasurable. It is difficult to quantify the total amount of drugs, number of undocumented noncitizens, documents, money, weapons permitted to enter the country illegally, and the amount and types of sensitive information disclosed. These instances not only erode the public trust, but also redirect significant operational resources.

For the corrupt employees, more than half (**64 percent**) were sentenced to prison time from **less than 1 year to over 70 years**. Others lost liberties and were placed on probation, supervised release, and home confinement. They paid nearly **$3 million** in fines, special assessments, and restitution. Nearly one quarter faced disciplinary actions up to and including removal from federal service. The remaining employees left CBP while under investigation opting to either retire or resign[6]. Their families lost income and benefits, experienced shame, embarrassment in their communities, and in many cases, access to their parent or spouse.

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[5] See Appendix A – Study Method
[6] See Appendix C – Aggregate Case Outcomes

PREVENTING CORRUPTION

In CBP, OPR safeguards the integrity and security of the workforce and promotes compliance with agency-wide programs and policies related to corruption, misconduct, and mismanagement. OPR executes CBP's internal security and integrity awareness programs, conducts pre-employment screening as well as the intake and investigation of allegations of serious misconduct.

Operating in such a complex environment requires not only tremendous focus, but also a commitment to the highest standards of professionalism, integrity, and accountability. The CBP Integrity and Personal Accountability Strategy of 2014 provided a cross-cutting framework to prevent, detect, investigate, respond to, and raise awareness of integrity issues and employee misconduct. The process begins with pre-employment screening to determine suitability for employment, continues with setting clear expectations for personal conduct, working proactively to detect potential misconduct, investigating allegations of misconduct, and holding employees accountable for violations.

Pre-Employment Screening

CBP rigorously screens prospective employees in accordance with regulations set forth by OPM and the Director of National Intelligence to determine suitability for federal employment and or eligibility to access classified information.

All applicants for CBP's law enforcement positions undergo a pre-employment polygraph examination. This requirement has evolved since 2008 when applicants were selected for testing, to 2010 when the polygraph became a requirement under the auspices of the Anti-Border Corruption Act (ABCA). Only one of the **173** subjects in this study took a pre-employment polygraph exam as part of pre-employment screening because the majority of the employees joined CBP prior to the establishment of the CBP polygraph program in 2008.

The law enforcement occupations are designated as National Security positions and applicants undergo a pre-security interview and Tier V background investigation, the highest level of scrutiny available. While effective at screening out applicants, these measures assess past behavior and are not intended to evaluate propensity to engage in misconduct in the future or predict the impact of key work and life stressors over the course of an employee's career. To identify any issues that would affect an employee's continued suitability or eligibility (and thereby aid in detecting potential misconduct and corruption), CBP conducts periodic reinvestigations which are mandated by the ABCA to occur every 5 years. However, as evidenced in the study, nearly one third of subjects were the subjects of other types of allegations and/or were arrested prior to the 5-year mark, and thus were not employed long enough for a periodic reinvestigation. CBP fills this gap through the Continuous Evaluation (CE) program, a near real time personnel security process used to continuously evaluate the background of these CBP employees in Sensitive/National Security positions, independent of the 5-year periodic reinvestigation.

All the employees studied underwent the highest level of personnel screening mandated at the time they entered CBP and its legacy agencies. Each was found suitable during their initial pre-employment BI

and those who underwent periodic reinvestigations were found suitable as well. Taken together, the changes CBP has implemented in the realm of personnel security screening would apply to **92 percent** of the subjects in the study, namely those employed as BPAs and CBPOs. It is reasonable to suggest that the heightened scrutiny and the polygraph exam would likely identify additional areas of concern for personnel security specialists to consider in their adjudications. The efficacy of the pre-employment polygraph exam will be the focus of subsequent assessments on corruption.

Intake and Processing Allegations of Misconduct and Corruption

There is an affirmative duty to report violations of the Standards of Conduct and any matters that could reflect substantive misconduct or mismanagement. Employees must report criminal activity that violates state or federal laws such as bribery, theft, misuse of funds, smuggling, drug possession, perjury, civil rights violations, and instances in which they have been arrested. They are also required to report serious misconduct that could jeopardize the CBP mission including misuse of government IT systems, falsification, abuse of official position for personal gain, workplace violence or harassment, improper association, and willful misuse of government vehicles or property. Failure to report misconduct constitutes misconduct and may serve as the basis for potential discipline. All such matters may be reported to the **CBP JIC** or the **DHS OIG**.

> **REPORTING MISCONDUCT**
>
> **CBP Joint Intake Center**
> 1-877-2INTAKE
> JointIntake@cbp.dhs.gov
> P.O. Box 14775
> 1225 Pennsylvania Avenue, NW
> Washington, DC 20044
>
> **DHS Office of Inspector General**
> 1-800-323-8603
> DHSOIGHOTLINE@dhs.gov
> http://www/oig.dhs.gov/hotline

The intake process is initiated upon receipt of a complaint, allegation of misconduct, or other report. Situated within OPR, the JIC is the centralized intake point and clearinghouse for complaints and allegations of misconduct involving CBP employees and contractors and receives approximately 8,000-9,000 reports per year[7]. In addition to complaints and allegations of misconduct, these JIC reports also include information on a variety of other matters including employee performance issues, workplace disagreements and grievances, critical incidents, technology disruptions, lost property, evidence handling discrepancies, and matters involving non-CBP facilities or individuals who have no affiliation to CBP. Most of these reports are from CBP employees but also include approximately 200-300 reports from the public by way of the CBP Information Center.

OPR refers allegations of serious misconduct to the DHS OIG for independent review and determination in accordance with the DHS Management Directive 0810.1. DHS OIG may hold the case and conduct its own investigation. OPR retains cases DHS OIG does not accept as well as those cases which do not meet criteria for referral. Cases involving lesser administrative misconduct are assigned back to the employee's program office for administrative inquiry or immediate management action. Matters that do not constitute misconduct are classified as received and closed or referred, as appropriate.

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[7] CBP OPR received 9,279 reports to the JIC in FY 2021.

Investigations

The enactment of the TFTEA granted CBP OPR long sought-after authority to investigate both criminal and administrative misconduct allegations involving officers, agents, and other employees of CBP[8]. Based on its newly conferred criminal investigative authority, OPR began investigating CBP workforce corruption allegations involving matters such as bribery and conspiracy linked to drug and human smuggling operations in addition to allegations of serious administrative misconduct including misuse of government IT systems and traveler abuses.

Presently, OPR criminal investigators are strategically located across the country and their work is routinely conducted in close collaboration with federal law enforcement partners including the DHS OIG, ICE Homeland Security Investigations (HSI), and the FBI. Regarding its long-standing collaboration with the FBI, OPR continues its post 9/11 support of FBI-led Border and Public Corruption Task Force operations by contributing ever-increasing numbers of investigators and investigative analysts targeting suspected border corruption with a nexus to national security objectives. IOD investigators also assist other federal, state, local or tribal authorities investigating use of force incidents involving death or serious injury, critical incidents (e.g., deaths in custody, vehicle accidents or roll overs) and off-duty employee misconduct incidents including arrests for domestic violence,
DUI/DWI, and other violations of state or local laws.

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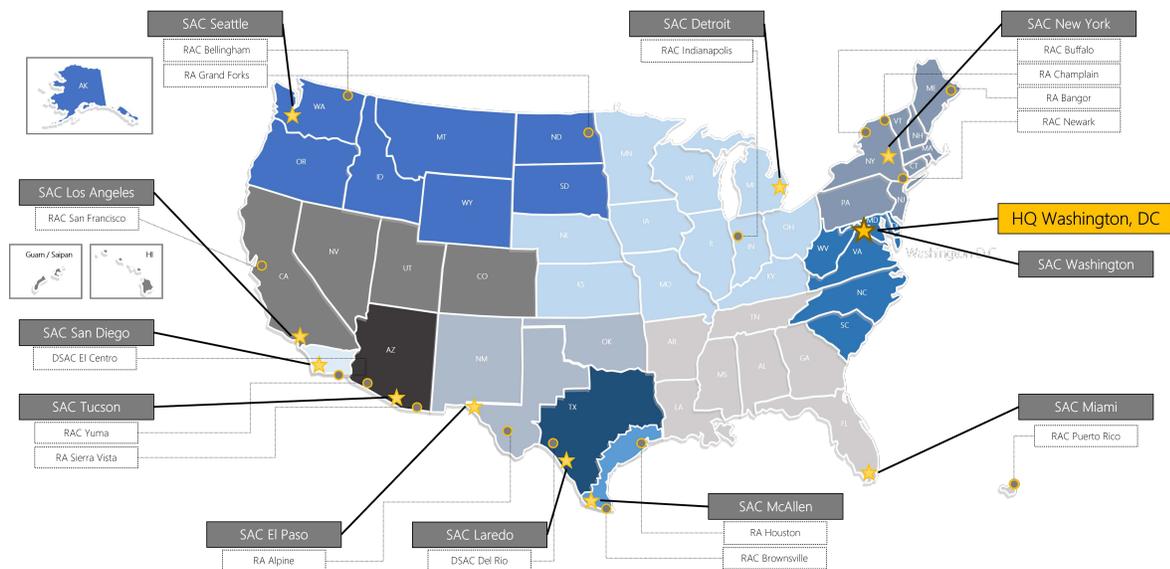
[8] Trade Facilitation and Trade Enforcement Act of 2015; prior to 2015, criminal investigations of CBP employees had been conducted primarily by the DHS OIG. ICE OPR had second right of refusal for all cases and took any remaining criminal or serious administrative cases that the DHS OIG declined. With the conversion to an 1811 work force, ICE OPR was removed from CBP misconduct cases.

Accountability

Completed investigations are transferred to the CBP Office of Human Resources Management (HRM) for review and determination as to whether the investigation and evidence collected substantiates misconduct. From there, in accordance with CBP's Delegations of Authority, cases are transferred to supervisory and managerial officials. CBP responds to substantiated allegations of misconduct by proposing discipline. The final disposition of proposed discipline is determined by a deciding official in the employee's chain of command. Discipline is imposed to deter misconduct that affects the efficiency of the service and to encourage conduct that complies with CBP's standards of conduct, standard operating procedures, policies, and office practices. CBP HRM and management ensure that the employee's rights are preserved throughout the discipline process and all decisions rendered are fair and consistent. Cases in which employees are convicted of criminal activity construed as corruption are featured on CBP's internal Trust Betrayed website.

Prevention and Awareness

The impact of corruption on the CBP workforce cannot be overstated. Internal corruption leads not only to a significant loss of public trust and confidence in the organization itself, but a commensurate erosion of employee morale because the men and women of CBP take corruption personally. When a co-worker or colleague is arrested for corruption-related misconduct, employees experience an array of emotions. There is shock, disbelief, frustration, and in some instances, visceral anger and animosity. Perhaps most significantly, fellow employees feel betrayed. They do not want these individuals in the workforce – they want them arrested, stripped of their badge, removed from duty, and prosecuted to the fullest extent of the law. Since its creation in 2003, integrity has been CBP's cornerstone, the key to maintaining the trust and confidence of the American people. Accordingly, promoting integrity is a fundamental responsibility extending well beyond the roles and responsibilities of any single CBP office, including OPR. Integrity is the responsibility of ALL CBP offices and components, and a mandate that permeates throughout CBP. Employees are reminded of their responsibilities for personal conduct and for reporting alleged misconduct of others in various training sessions, annual integrity awareness courses, musters, and in messages from CBP leadership.

CBP upholds its commitment to responsiveness and accountability by being transparent about violations. The newly created Transparency and Accountability page on the CBP website (www.cbp.gov) provides, in one place, a variety of information related to critical incidents, use of force, employee arrests, and other investigative matters. It builds upon CBP's previous work to increase transparency through the publication of annual reports on employee misconduct and discipline over the past several fiscal years. These publicly available reports have provided detailed information on the structure and operations of OPR, statistics on intake and investigations, and employee arrests, as well as the disciplinary outcomes.

CONCLUSION

Corruption cases involving CBP employees remain rare, and those involved represent an extraordinarily small fraction of the workforce. The overwhelming majority of CBP employees perform their duties with professionalism, honor, and above all, integrity. However, when corruption does occur, CBP carefully and methodically studies the cases to gain a better understanding of who was involved and why; when, where, and how the employees perpetrated illicit activity, and what policy gaps or operational vulnerabilities they circumvented or exploited. Doing so provides critical insights which enable OPR and CBP to continue to raise awareness and develop effective countermeasures. Building on the previous CBP Integrity and Personal Accountability Strategy, CBP recently announced its new CBP Integrity and Accountability Strategy. The strategy provides a framework broadening the focus of integrity efforts beyond corruption and misconduct to promote a more enterprise wide commitment and ensure CBP's climate and culture encourage and foster behavior that is not merely compliant, but exemplary.

Appendix A: Study Method

OPR researchers identified and gathered information from various sources to collect and analyze data for each of the 173 cases related to an employee demographics, duty assignments, personnel and employment history, security concerns identified in the background investigations, history of misconduct and disciplinary actions, systems use, key life events, aspects of corrupt activity, financial activity, investigation, and prosecution outcomes. Individual employee data was combined to compute aggregate frequencies and descriptive statistics.

Study Cases by Fiscal Year

Year	Cases
2005	24
2006	10
2007	7
2008	21
2009	26
2010	18
2011	13
2012	12
2013	13
2014	2
2015	7
2016	10
2017	10
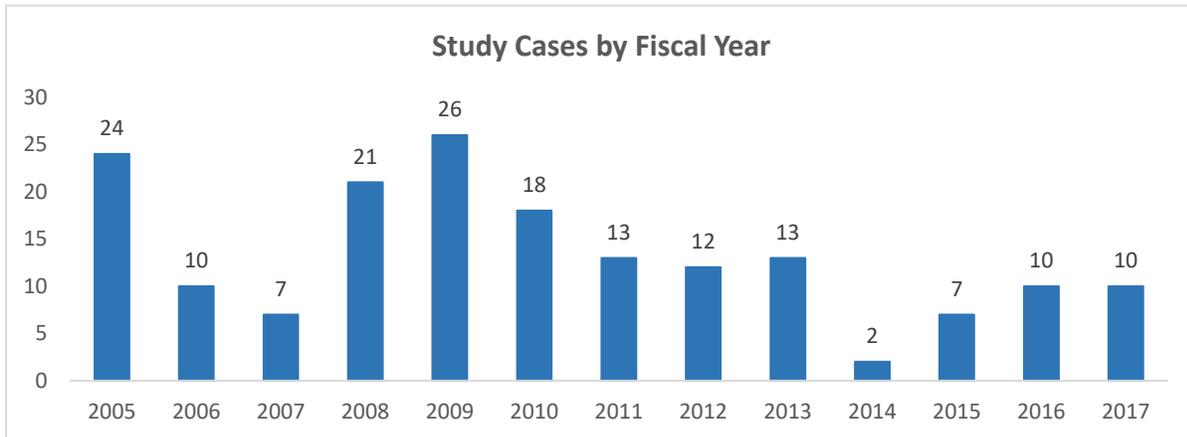
To understand what other CBP employees observed about these employees, OPR researchers also conducted semi-structured interviews[9] with a convenience sample[10] of 45 co-workers and supervisors of 22 of the employees in the study.

The following questions guided the study:
- What commonalities existed, if any, across offenses, demographics, organizational assignment, geography, and outcomes?

- What security concerns were identified in the subjects' background investigations and subsequent reinvestigations?

- What concerning or suspicious information or activity was known leading up to the corrupt activity?

- What did other CBP employees observe in the subjects? What did they do with the information or concerns?

- How did the subjects become involved in illegal activity?

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[9] Researchers used an interview protocol but diverted from it to probe and gain additional information on other topics or issues participants identified.

[10] A non-probability sample in which participants were accessible and available to participate. Many self-identified to researchers during Integrity Awareness presentations where corruption cases were discussed.

- How did the subjects misuse their positions for personal gain? How were vulnerabilities in systems, policy, or procedures exploited?

- What key life factors did the subjects experience prior to the onset of their illicit activity?

There are three main limitations to this study. First, the quality and quantity of archival investigative information available for each case varied by type of offense, investigative entity, and quality of the investigative reports. In general, the sources were not created for retrospective reviews to determine root causes of corruption, motives, or behaviors. Most reports of investigation used the single scope reporting which focuses on a summation of investigative steps compiled into a summary closing report. As a result, investigative reports may lack detailed descriptions of information that is relevant to understanding why and how employees engage in corrupt activity. When collecting data from source documents, researchers evaluated available evidence and made reasonable, educated conclusions. Absence of evidence in source documents should not be confused with presence or absence of a particular behavior or piece of information. Second, the amount and quality of information yielded from interviews was dependent upon successful recruitment of co-workers and supervisors and their willingness to be forthcoming. The interviews could have also suffered the effects of a law enforcement culture that discourages employees from reporting information by way of an actual or perceived code of silence or mistrust of OPR. Third, because this study was focused on employees, it was not designed to reveal a great deal about the organizational factors or content in which corrupt acts occurred.

Though important to note, these limitations do not diminish the value of the knowledge that can be gained from analyzing these corruption cases in the manner described. The study provides insight into corruption in CBP and is useful to those charged with ensuring integrity of their organizations.

Appendix B: List of Cases

Position	Post of Duty	Age/CBP Tenure	Offense Type	Outcome
CBPO	Douglas, AZ	38/7 years	Drug Smuggling	Guilty Plea Incarceration: 8 years
CBPO	Queens, NY	52/31 years	Drug Smuggling	Guilty Plea Probation: 4 years
CBPO	San Ysidro, CA	32/1 years	Drug and Noncitizen Smuggling	Guilty Plea Incarceration: 7 years
SCBPO	Los Angeles, CA	51/20 years	Drug Smuggling	Guilty Plea Incarceration: 3.75 years
BPA	Hebbronville, TX	35/4 years	Drug Smuggling	Conviction Incarceration: 20 years
SBPA	Calexico, CA	45/14 years	Noncitizen Smuggling	Guilty Plea Incarceration: 6.25 years
BPA	Wellton, AZ	25/2 years	Drug Smuggling	Guilty Plea Incarceration: 5 years
CBPO	Los Angeles, CA	53/17 years	Immigration Document Fraud	Guilty Plea Incarceration: 0.5 year
CBPO	Port Huron, MI	43/8 years	Theft	Guilty Plea Incarceration: 0.25 year
CBPO	Nogales, AZ	51/2 years	Drug Smuggling	Conviction Incarceration: 9 years
SCBPO	Los Angeles, CA	42/9 years	Misuse Government System	Conviction Home Confinement: 0.5 year
CBPO	Laredo, TX	34/9 years	Noncitizen Smuggling	Guilty Plea Incarceration: 4.3 years
BPA	El Paso, TX	47/21 years	Drug Smuggling	Guilty Plea Incarceration: 70 years
BPA	Wellton, AZ	35/4 years	Drug Smuggling	Conviction Incarceration: 8 years
BPA	El Cajon, CA	26/3 years	Noncitizen Smuggling	Guilty Plea Incarceration: 2 years
CBPO	Nogales, AZ	47/13 years	Theft	Guilty Plea Probation: 5 years
CBPO	Blaine, WA	30/8 years	Drug Smuggling	Conviction Incarceration: 2.67 years
SBPA	McAllen, TX	48/24 years	Drug Smuggling	Guilty Plea Incarceration: 2 years
CBPO	Charleston, SC	45/21 years	Misuse Government System	Guilty Plea Probation: 1 year
BPA	Naco, AZ	24/2 years	Noncitizen Harboring	Conviction Probation: 2 years

Position	Post of Duty	Age/CBP Tenure	Offense Type	Outcome
CBPO	Tucson, AZ	42/5 years	Misuse Government System	Guilty Plea Probation: 3 years
CBPO	Detroit, MI	49/7 years	Noncitizen Smuggling	Guilty Plea Incarceration: 2 years
BPA	Naco, AZ	23/2 years	Noncitizen Harboring	Guilty Plea Probation: 2 years
BPA	Naco, AZ	40/10 years	Money Laundering	Guilty Plea Incarceration: 2 years
CBPO	Buffalo, NY	41/8 years	Misuse Government System	Conviction Halfway house: 0.4 year
Customs Patrol Officer (CPO)	Tucson, AZ	41/11 years	Theft	Guilty Plea Probation: 5 years
CBP Technician (CBPT)	Newark, NJ	46/7 years	Fraud – Financial	Conviction Probation: 2 years
BPA	Lordsburg, NM	43/8 years	Noncitizen Smuggling	Guilty Plea Probation: 2 years
BPA	Douglas, AZ	41/12 years	Fraud – Identity Theft	Guilty Please Incarceration: 3 years
Port Director (SCBPO)	Detroit, MI	43/17 years	Drug/Noncitizen Smuggling	Conviction Probation: 3 years
CBPO	San Ysidro, CA	29/5 years	Misuse Government System	Guilty Plea Time Served
BPA	Nogales, AZ	29/6 years	Drug Smuggling	Guilty Plea Incarceration: 0.67 years
CBPO	Los Angeles, CA	55/8 years	Theft	Conviction Incarceration: 3.08 years
BPA	Harlingen, TX	37/11 years	Fraud – Documents	Guilty Plea Probation: 3 years
CBPO	Brownsville, TX	50/17 years	Noncitizen Smuggling	Guilty Plea Incarceration: 1.58 years
CBPT	Boston, MA	50/19 years	Theft	Conviction Probation: 2 years
CBPO	El Paso, TX	48/10 years	Noncitizen Smuggling	Guilty Plea Incarceration: 1 year
CBPO	San Ysidro, CA	50/11 years	Noncitizen Smuggling	Guilty Plea Incarceration: 5 years
Entry Specialist	Nogales, AZ	34/8 years	Fraud - Documents	Guilty Plea Probation: 2 years
Agriculture Specialist	Miami, FL	26/3 years	Drug Possession and Distribution	Conviction Incarceration: 5 years
CBPO	El Paso, TX	33/4 years	Drug Smuggling	Conviction Incarceration: 20 years

Position	Post of Duty	Age/CBP Tenure	Offense Type	Outcome
CBPO	Buffalo, NY	43/5 years	Misuse Government System	Plea Deal No Sentence
BPA	Laredo, TX	33/6 years	Noncitizen Smuggling	Guilty Plea Incarceration: 4.92 years
CBPO	Houston, TX	47/20 years	Fraud - Documents	Guilty Plea Probation: 2 years
SCBPO	Charleston, SC	44/17 years	Misuse Government System	Guilty Plea Probation: 2 years
CBPO	Vancouver, BC	47/17 years	Fraud – Documents	Guilty Plea Probation: 1 year
BPA	Sierra Blanca, TX	33/2 years	Drug/Noncitizen Smuggling	Guilty Plea Incarceration: 2 years
BPA	Uvalde, TX	35/6 years	Theft	Guilty Plea Probation: 5 years
Auto Mechanic (AM)	Tucson, AZ	58/5 years	Theft	Guilty Plea Probation: 1 year
AS	San Francisco, CA	50/17 years	Fraud - Documents	Guilty Plea Probation: 1 year
CBPO	Las Vegas, NV	29/6 years	Noncitizen Smuggling	Guilty Plea Incarceration: 2.5 years
CBPO	Miami, FL	33/13 years	Drug Smuggling	Conviction Incarceration: 30 years
CBPO	Miami, FL	40/8 years	Fraud – Documents	Guilty Plea Time Served
CBPO	Miami, FL	46/11 years	Fraud – Documents	Guilty Plea Probation: 2 years
BPA	Falfurrias, TX	37/11 years	Drug Smuggling	Conviction Incarceration: 14 years
BPA	Naco, AZ	35/10 years	Theft	Guilty Plea Fine Only
CBPO	San Ysidro, CA	56/10 years	Noncitizen Smuggling	Guilty Plea Incarceration: 4.75 years
BPA	Sierra Blanca, TX	30/2 years	Drug/Noncitizen Smuggling	Conviction Incarceration: 10.58
CBPO	Calexico, CA	22/1 year	Release Information	Guilty Plea Incarceration: 3 years
BPA	Sierra Blanca, TX	30/2 years	Drug/Noncitizen Smuggling	Conviction Incarceration: 8 years
BPA	Rio Grande City, TX	31/8 years	Drug Smuggling	Conviction Incarceration: 5 years
BPA	Comstock, TX	25/1 year	Drug Smuggling	Conviction Incarceration: 15 years

Position	Post of Duty	Age/CBP Tenure	Offense Type	Outcome
CBPO	Romulus, MI	41/20 years	Misuse Government System	Guilty Plea Fine Only
CBPO	Detroit, MI	32/9 years	Fraud – Documents	Guilty Plea Probation: 2 years
BPA	Sonoita, AZ	25/1 year	Release of Information	Guilty Plea Incarceration: 1.67 years
Law Enforcement Communications Specialist	El Centro, CA	34/2 years	Drug Smuggling	Conviction Incarceration: 0.42 years
CBPO	Blaine, WA	48/18 years	Cigarette Smuggling	Conviction Incarceration: 1 year
BPA	McAllen, TX	37/8 years	Drug Smuggling	Guilty Plea Incarceration: 8.08 years
BPA	Sierra Blanca, TX	34/2 years	Drug/Noncitizen Smuggling	Conviction Incarceration: 2 years
CBPO	Chicago, IL	27/5 years	Drug Smuggling	Guilty Plea Incarceration: 1 year
CBPO	Laredo, TX	35/6 years	Theft	Guilty Plea Incarceration: 1 year
CBPT	El Paso, TX	43/12 years	Drug Smuggling	Guilty Plea Incarceration: 20 years
CBPO	Brownsville, TX	64/16 years	Noncitizen Smuggling	Conviction Incarceration: 2 years
CBPO	Laredo, TX	33/4 years	Noncitizen Smuggling	Conviction Incarceration: 3 years
CBPO	San Luis, AZ	42/6 years	Drug Smuggling	Guilty Plea Incarceration: 3.08 years
CBPO	San Ysidro, CA	44/16 years	Noncitizen Smuggling	Conviction Incarceration: 5 years
CBPO	Detroit, MI	35/6 years	Misuse Government System	Conviction Probation: 2 years
SCBPO	Queens, NY	65/20 years	Drug Smuggling	Guilty Plea Incarceration: 10 years
BPA	Sonoita, AZ	33/9 years	Drug Smuggling	Conviction Incarceration: 7.5 years
CBPO	Hidalgo, TX	39/12 years	Noncitizen Smuggling	Guilty Plea Incarceration: 9 years
BPA	Brownsville, TX	38/9 years	Theft	Guilty Plea Probation: 3 years
CBPO	Middleburg Heights, OH	49/20 years	Misuse Government System	Guilty Plea Probation: 1 year
CPO	Douglas, AZ	35/11 years	Theft	Guilty Plea

Position	Post of Duty	Age/CBP Tenure	Offense Type	Outcome
				Home Confinement: 1 year
BPA	Jacksonville, FL	45/21 years	Drug Smuggling	Guilty Plea Incarceration: 0.5 year
BPA	Ajo, AZ	40/12 years	Theft	Guilty Plea Fine Only
CBPO	Brownsville, TX	41/12 years	Drug/Noncitizen Smuggling	Guilty Plea Incarceration: 11.25 years
BPA	Yuma, AZ	30/6 years	Drug Smuggling	Guilty Plea Incarceration: 15 years
BPA	Calexico, CA	31/6 years	Drug Smuggling	Conviction Incarceration: 5 years
CBPO	New Orleans, LA	46/7 years	Drug Smuggling	Conviction Incarceration: 7.75 years
CBPO	Atlanta, GA	48/12 years	Theft	Guilty Plea Probation: 3 years
BPA	Las Cruces, NM	29/5 years	Noncitizen Smuggling	Guilty Plea Incarceration: 5 years
CBPO	San Ysidro, CA	47/16 years	Drug/Noncitizen Smuggling	Conviction Incarceration: 7.5 years
AM	Ajo, AZ	48/8 years	Theft	Guilty Plea Probation: 5 years
CBPO	Port Arthur, TX	39/13 years	Noncitizen Smuggling	Guilty Plea Incarceration: 1.58 years
SCBPO	Miami, FL	42/14 years	Fraud – HUD	Guilty Plea Home Confinement: 0.67 year
CBPO	El Paso, TX	33/8 years	Drug Smuggling	Guilty Plea Incarceration: 8.33 years
CBPO	Eagle Pass, TX	43/11 years	Drug Smuggling	Guilty Plea Incarceration: 5 years
CBPO	Nogales, AZ	56/13 years	Theft	Conviction Probation: 3 years
BPA	Imperial Beach, CA	36/10 years	Drug Smuggling	Guilty Plea Incarceration: 5.83 years
BPA	Hebbronville, TX	30/6 years	Noncitizen Harboring	Conviction Incarceration: 20 years
BPA	Deming, NM	30/4 years	Drug Smuggling	Guilty Plea Incarceration: 6 years
SCBPO	El Paso, TX	54/23 years	Noncitizen Smuggling	Conviction Incarceration: 7.5 years
CBPO	San Luis, AZ	45/20 years	Noncitizen Smuggling	Guilty Plea Incarceration: 3.08 years
SCBPO	Chicago, IL	51/22 years	Fraud - Documents	Guilty Plea Incarceration: 3.83 years

Position	Post of Duty	Age/CBP Tenure	Offense Type	Outcome
BPA	Imperial Beach, CA	27/4 years	Noncitizen Smuggling	Guilty Plea Halfway House: 0.5 years
CBPO	Los Angeles, CA	48/9 years	Weapons	Guilty Plea Incarceration: 3 years
BPA	Casa Grande, AZ	33/2 years	Theft	Conviction Fine Only
CBPO	Hidalgo, TX	43/16 years	Drug Smuggling	Guilty Plea Incarceration: 14 years
SBPA	Calexico, CA	44/14 years	Noncitizen Smuggling	Guilty Plea Incarceration: 6.5 years
BPA	Sandusky, OH	32/6 years	Theft	Guilty Plea Detention: 0.08 years
CBPO	Miami, FL	49/23 years	Noncitizen Smuggling	Conviction Incarceration: 6.5 years
CBPO	Buffalo, NY	35/8 years	Misuse Government System	Guilty Plea None
CBPO	Progreso, TX	40/8 years	Transporting and Harboring Noncitizens	Conviction Incarceration: 1.5 years
BPA	El Paso, TX	29/5 years	Weapons	Guilty Plea Incarceration: 4.25 years
CBPO	Brownsville, TX	34/3 years	Drug/Noncitizen Smuggling	Guilty Plea Incarceration: 11.67 years
BPA	Zapata, TX	30/1 year	Drug Smuggling	Conviction Incarceration: 14 years
CBPO	Eagle Pass, TX	36/13 years	Fraud – Marriage	Guilty Plea Probation: 5 years
CBPO	Miami, FL	31/4 years	Drug Smuggling	Guilty Plea Incarceration: 14 years
CBPO	Fort Lauderdale, FL	37/5 years	Drug Smuggling	Conviction Incarceration: 10 years
CBPO	El Paso, TX	29/4 years	Drug Smuggling	Guilty Plea Probation: 5 years
CBPO	Herndon, VA	39/8 years	Misuse Government System	Guilty Plea Incarceration: 0.25 year
BPA	Uvalde, TX	32/6 years	Theft	Guilty Plea Incarceration: 0.92 years
BPA	San Ysidro, CA	46/11 years	Noncitizen Smuggling	Guilty Plea Incarceration: 3 years
CBPO	San Diego, CA	33/8 years	Misuse Government System	Guilty Plea Probation: 3 years

Position	Post of Duty	Age/CBP Tenure	Offense Type	Outcome
BPA	El Paso, TX	41/21 years	Theft	Guilty Plea None
BPA	El Cajon, CA	28/3 years	Noncitizen Smuggling	Conviction Incarceration: 5 years
CBPO	Calexico, CA	30/1 year	Drug Smuggling	Conviction Incarceration: 12 years
CBPO	Newark, NJ	31/2 years	Noncitizen Smuggling	Conviction Incarceration: 2.25 years
CBPT	Laredo, TX	65/16 years	Theft	Guilty Plea Probation: 1 year
BPA	Nogales, AZ	38/9 years	Drug Smuggling	Guilty Plea Incarceration: 1.67 years
CBPO	Brownsville, TX	38/16 years	Weapons	Conviction Home Confinement: 0.5 years
CBPO	Miami, FL	44/8 years	Misuse Government System	Guilty Plea Incarceration: 0.58 years
Mission Support Specialist	Blaine, WA	44/2 years	Theft	Guilty Plea Probation: 2 years
BPA	Nogales, AZ	47/14 years	Drug Smuggling	Guilty Plea Incarceration: 13.3 years
CBPO	Washington, DC	56/18 years	Theft	Guilty Plea Probation: 5 years
CBPO	Roma, TX	35/4 years	Drug Smuggling	Guilty Plea Incarceration: 17.5 years
CBPO	Brownsville, TX	37/7 years	Drug/Noncitizen Smuggling	Guilty Plea Incarceration: 17 years
SCBPO	Norfolk, VA	45/7 years	Theft	Guilty Plea Probation: 2 years
CBPO	New Orleans, LA	30/6 years	Fraud – HUD	Guilty Plea Fine Only
BPA	Grand Forks, ND	30/5 years	Fraud – False Statements	Guilty Plea Time Served
CBPO	San Ysidro, CA	45/4 years	Noncitizen Smuggling	Guilty Plea Incarceration: 6.5 years
CBPO	Eagle Pass, TX	34/5 years	Drug Smuggling	Guilty Plea Incarceration: 1.5 years
BPA	Laredo, TX	35/7 years	Noncitizen Harboring	Guilty Plea Incarceration: 2 years
BPA	Rio Grande City, TX	34/5 years	Drug Smuggling	Conviction Incarceration: 14 years
CBPO	Houston, TX	35/7 years	Misuse Government System	Guilty Plea Probation: 3 years
CBPO	Pharr, TX	46/8 years	Drug Smuggling	Guilty Plea

Position	Post of Duty	Age/CBP Tenure	Offense Type	Outcome
				Supervised Release: 2 years
CBPO	Progreso, TX	55/9 years	Noncitizen Smuggling	Guilty Plea Incarceration: 2 years
CBPO	Atlanta, GA	45/7 years	Weapons	Guilty Plea Incarceration: 8 years
BPA	Nogales, AZ	29/5 years	Drug Smuggling	Conviction Incarceration: 15 years
CBPO	San Ysidro, CA	53/15 years	Theft	Guilty Plea Incarceration: 0.99 years
CBPO	San Ysidro, CA	33/9 years	Fraud – Wire	Guilty Plea Incarceration: 1.33 years
SCBPO	Miami, FL	52/14 years	Misuse Government System	Guilty Plea Probation: 1 year
CBPO	Roma, TX	41/6 years	Noncitizen Smuggling	Conviction Incarceration: 3 years
CBPO	Brownsville, TX	43/11 years	Noncitizen Smuggling	Guilty Plea Incarceration: 2.5 years
CBPO	Queens, NY	48/19 years	Noncitizen Harboring	Guilty Plea Probation: 3 years
BPA	Santa Teresa, NM	39/9 years	Fraud – HUD	Guilty Plea Probation: 5 years
CBPO	Busan, South Korea	52/16 years	Fraud – Wire	Conviction Incarceration: 2 years
CBPO	Hidalgo, TX	31/10 years	Fraud – Documents	Guilty Plea Incarceration: 1.5 years
CBPO	Alexandria Bay, NY	47/10 years	Theft	Conviction Probation: 1 year
CBPO	Richford, VT	29/4 years	Theft	Guilty Plea Probation: 2 years
CBPO	San Ysidro, CA	63/17 years	Noncitizen Smuggling	Guilty Plea Home Confinement: 3 years
CBPO	Douglas, AZ	32/3 years	Drug Smuggling	Conviction Incarceration: 12 years
BPA	El Paso, TX	38/4 years	Drug Smuggling	Conviction Incarceration: 5.83 years
BPA	San Ysidro, CA	40/10 years	Noncitizen Smuggling	Conviction Incarceration: 30 years
CBPO	Laredo, TX	28/4 years	Fraud – Documents	Conviction Incarceration: 5 years
BPA	Imperial Beach, CA	39/13 years	Noncitizen Smuggling	Conviction Incarceration: 35 years
CBPO	Otay, CA	47/17 years	Theft	Guilty Plea Probation: 1 year

Position	Post of Duty	Age/CBP Tenure	Offense Type	Outcome
Supervisory Management Program Analyst	Washington, DC	47/22 years	Theft	Guilty Plea Probation: 2.5 years
CBPO	Saipan, N. Mariana Islands	42/5 years	Fraud – Wire	Guilty Plea Incarceration: 0.08 years
SCBPO	San Diego, CA	42/6 years	Misuse Government System	Guilty Plea Home Confinement: 0.5 year
CBPO	Brownsville, TX	38/7 years	Drug Smuggling	Guilty Plea Incarceration: 6.5 years
BPA	McAllen, TX	34/5 years	Drug Smuggling	Guilty Plea Incarceration: 7.25 years
BPA	Imperial Beach, CA	34/5 years	Theft	Guilty Plea Incarceration: 3.08 years

Appendix C: Aggregated Case Outcomes

Outcome	Number of Employees
Suspension	2
Demotion (Employee was reassigned to a non-law enforcement position with reduction in grade level)	2
Removal	38
Retirement	7
Resignation	123
Record unavailable	1