

GAO Highlights

Highlights of [GAO-25-106568](#), a report to the Honorable Sheldon Whitehouse, United States Senate

Why GAO Did This Study

Criminal organizations generate money from illicit activities such as drug and human trafficking and launder the proceeds. Federal agencies investigate illicit activity and have developed several strategies and efforts to combat these crimes.

GAO was asked to review efforts to counter illicit finance activities. This report addresses, among other things, (1) selected agencies' roles and responsibilities in investigating and prosecuting illicit finance activities and (2) the progress made with selected strategies and efforts to counter illicit finance activities.

To address these objectives, GAO reviewed agency documents and data, including those related to eight selected federal strategies and efforts on countering illicit finance activities. GAO compared four of these strategies and efforts—which represent long-range, multiagency undertakings—to selected key practices for evidence-based policymaking and for interagency collaboration.

What GAO Recommends

GAO is making four recommendations, including that Treasury collect and assess performance information on implementing the Illicit Finance Strategy, and that the Department of State and U.S. Agency for International Development establish goals and assess progress for implementing the Initiative. Treasury disagreed with the recommendation, State agreed with the intent of the recommendation but believes it already addressed it, and USAID agreed. The National Security Council did not provide comments.

View [GAO-25-106568](#). For more information, contact Triana McNeil at (202) 512-8777 or McNeilT@gao.gov.

January 2025

ILLICIT FINANCE

Agencies Could Better Assess Progress in Countering Criminal Activity

What GAO Found

Key federal agencies are responsible for investigating entities involved in illicit finance activities and referring them for federal prosecution. For example, the Federal Bureau of Investigation investigates transnational criminal organizations and associated money laundering efforts. Similarly, Immigration and Customs Enforcement's Homeland Security Investigations conducts investigations of criminal organizations in relation to cross-border movement of people, goods, and money. These federal law enforcement agencies and others often work together in interagency collaborative groups, such as task forces, that coordinate investigations of transnational organized crime, money laundering, and major drug trafficking networks. The Department of Justice prosecutes defendants accused of committing federal crimes, including those related to illicit finance.

Federal agencies are taking actions to implement selected government-wide strategies and efforts to counter illicit finance activities, but progress in implementation is not measured in some instances. In these cases, the strategies and efforts do not all have clearly defined goals, and lead agencies or entities do not regularly collect and assess relevant performance information tied to goals. For example, in the 2024 *National Strategy for Combating Terrorist and Other Illicit Financing* (Illicit Finance Strategy), the Department of the Treasury lists over 120 benchmarks (or goals) that agencies are generally implementing. However, Treasury does not collect and assess performance information from the implementing agencies to determine their progress against the goals. Similarly, entities leading the *Presidential Initiative for Democratic Renewal* (Initiative)—a set of policy and foreign assistance efforts to fight corruption, among other things—have not set joint performance goals or assessed whether agencies are achieving the goals. Such goals and assessments of performance information could help collaborating agencies ensure accountability for common outcomes and inform decisions, which would be in line with leading practices for evidence-based policymaking and interagency collaboration.

Extent That Selected Federal Strategies and Efforts Related to Countering Illicit Finance Activities Have Goals and Performance Information is Collected

Strategy or effort	Lead agency or entity	Government-wide goals are documented or set by lead agency or entity	Lead agency or entity collects and assesses performance information tied to goals
National Drug Control Strategy	Office of National Drug Control Policy	✓	✓
National Strategy for Combating Terrorist and Other Illicit Financing	Department of the Treasury's Office of Terrorist Financing and Financial Crimes	✓	✗
U.S. Strategy on Countering Corruption	White House, coordinated by the National Security Council	✓	✗
Presidential Initiative for Democratic Renewal	National Security Council in consultation with Department of State and United States Agency for International Development	✗	✗

Source: GAO analysis of agency documentation. | GAO-25-106568