Department of Justice

TESTIMONY OF

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BEFORE THE

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COMMITTEE ON THE WAYS AND MEANS
U.S. HOUSE OF REPRESENTATIVES

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IRS CIVIL ASSET FORFEITURE AUTHORITIES AND CASES

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Testimony of Kenneth A. Blanco
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U.S. Department of Justice
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Chairman Roskam, Vice-Chairman Meehan, Ranking Member Lewis, and distinguished members of the Committee. Thank you for the opportunity to appear before the Committee today to discuss the important topics of asset forfeiture and structuring. I am honored to represent the Department of Justice (the Department) at this hearing and to address the Department's commitment to ensuring that federal asset forfeiture laws are appropriately and effectively used in structuring cases, consistent with civil liberties and the rule of law.

Introduction

Asset forfeiture and the structuring laws are critical legal tools that serve a number of compelling law enforcement purposes. The Bank Secrecy Act assists law enforcement in the detection of criminal conduct by requiring financial institutions to file reports concerning suspicious financial transactions in excess of $10,000. The structuring laws enacted by Congress are intended to prevent individuals from evading reporting requirements under the Bank Secrecy Act. Indeed, as Congress itself has noted, the purpose of the Bank Secrecy Act, including the structuring offenses, codified at 31 U.S.C. § 5324, is "to require certain reports or records where they have a high degree of usefulness in criminal, tax, or regulatory investigations or proceedings, or in the conduct of intelligence or counterintelligence activities, including analysis, to protect against international terrorism." 31 U.S.C. § 5311. When structuring occurs, it deprives law enforcement of this critical information, which is why Congress made structuring a criminal offense.

The Department's ongoing internal review of the Asset Forfeiture Program includes the structuring policy issued by the Department last year. The Department is eager to foster better understanding of asset forfeiture in structuring cases and promote a constructive dialogue about sensible ways to improve the Asset Forfeiture Program. While the Department is proud of its enforcement of the structuring laws, we are aware of concerns raised about certain seizure and forfeiture practices in connection with structuring violations. The Department welcomes the opportunity to address those concerns here today. Asset forfeiture and its use in structuring cases play a unique and multifaceted role in our legal system, and the Department is constantly looking for ways in which the Asset Forfeiture Program can be improved.

Overview of Structuring

Congress created the structuring offenses "to aid the government's efforts to uncover and prosecute crime and fraud." *United States v. Malewicka*, 664 F.3d 1099, 1107 (7th Cir. 2011). Generally speaking, structuring occurs when, instead of conducting a single transaction in an amount that would require a report to be filed or record made by a domestic financial institution,

the violator conducts a series of currency transactions, keeping each individual transaction at an amount below applicable thresholds to evade reporting or recording. By structuring transactions to avoid reporting requirements, a criminal causes the government to lose valuable information about the use of the financial system and potential unlawful activity. In addition, the criminal's structuring affects the financial institution's duty to file the appropriate currency transaction reports, which are necessary to the investigation and prosecution of criminal and regulatory offenses.

The structuring laws are critical tools that law enforcement employs to safeguard the security and stability of our nation's financial system. For this reason, structuring is a stand-alone criminal offense. The government is required to prove three elements for a structuring charge under 31 U.S.C. § 5324(a), namely that the defendant: (1) structured his transactions, (2) knew of the reporting requirements, and (3) intended to evade the reporting requirements. It is important to note that structuring is not a strict liability crime. Congress included an intent provision in § 5324 in order to "shield innocent conduct from prosecution." *United States v. Taylor*, 816 F.3d 12, 23 (2d Cir. 2016). An individual who inadvertently divides up his deposits or withdrawals cannot be liable for structuring because he lacks the intent to evade the reporting requirements. This point bears repeating – the structuring offense is not a trap for the unwary. If the government cannot prove that an individual intended to evade reporting requirements, then the government cannot prevail, regardless of whether the proceeding is a civil forfeiture of the structured money or a criminal prosecution of the owner of the funds for structuring.

Structuring is often a tool used to mask additional, serious criminal activity. Terrorists, transnational organized crime groups, and other criminal actors frequently structure transactions to hide the proceeds and facilitate the commission of their criminal activity. For example, in 2003 in *United States v. Alamoudi*, a structuring investigation resulted in the disruption of terrorism. Abdurahman Alamoudi was arrested for engaging in prohibited financial transactions with Libya, and then indicted for a variety of charges, including money structuring. While detained pre-trial, he admitted that he took money from the Qaddafi regime in Libya to arrange the assassination of the de facto ruler of Saudi Arabia. In accordance with his guilty pleas in 2004, Alamoudi admitted that he had attempted to structure the funds he received from the Qaddafi regime into his U.S. bank account in order to evade cash reporting requirements. Alamoudi was sentenced to 23 years in prison upon his convictions. The structuring investigation was one of the charges that led to the discovery of the assassination plot after Alamoudi's arrest.

Another area where the ability to prevent structuring is invaluable is the government's effort to target funnel accounts. A funnel account is a bank account used by criminals to quickly move the proceeds of their criminal activity across geographic regions. Criminal organizations of all types, including drug cartels, human traffickers, sophisticated financial fraudsters, and trade-based money launderers use funnel accounts to avoid bulk cash transportation of their criminal proceeds, which is perceived to carry a higher risk of being seized by law enforcement or lost by money couriers. In making the required deposits and withdrawals from the account, couriers will often structure the transactions to avoid the currency reporting requirements. While funnel accounts are frequently used to move criminal proceeds, often it is not clear from the account activity itself what the crime is. Thus, this is an area where traditional investigative

work combined with civil forfeitures furthers the goal of disrupting major criminal organizations. Indeed, in some cases, structuring may be the only criminal offense available for prosecution.

Overview of Forfeiture Law

Though some have called forfeiture an unusual legal concept, the fact is that forfeiture has been an integral part of American jurisprudence dating back to the nation's founding. One of the first acts of Congress in 1789 was to enact a forfeiture statute subjecting vessels and cargoes to civil forfeiture for violation of the customs laws. Congress codified the traditional maritime law principle that a ship involved in crime was subject to forfeiture even if the owner was not criminally charged or convicted. The vessel was civilly forfeited as an instrumentality of the offense so that it could not be reused in criminal activity. Since that time, forfeiture has been broadened to a wider range of criminal conduct in an effort to deter criminal activity and compensate victims of crime. Although the concept and terminology may seem unusual and unfamiliar to some, the legal and policy basis for civil forfeiture is not.

1. Types of Asset Forfeiture

There are three types of asset forfeiture – criminal, civil, and administrative. While each is governed by different authorities and practices, all three require that the government bear the burden of proof. For comparative purposes, it is useful to briefly review criminal and administrative forfeiture to help highlight the features of the civil forfeiture process.

a. Criminal Forfeiture

Criminal forfeiture is an action against a defendant that includes notice of the intent to forfeit property in a criminal indictment. A criminal conviction is required, and forfeiture is part of the defendant's sentence. Criminal forfeiture is limited to the property interests of the defendant, including any proceeds earned by the defendant's illegal activity. Further, criminal forfeiture is generally limited to the property involved in the particular counts on which the defendant is convicted. As part of sentencing, a court may order the forfeiture of a specific piece of property listed in the indictment, of a sum of money as a money judgment, or other property as substitute property. After proving guilt beyond a reasonable doubt, the government must establish by a preponderance of the evidence the requisite connection between the crime of conviction and the asset. After a preliminary order of forfeiture is entered, a separate, ancillary proceeding begins to determine any third-party ownership interests in the property the government seeks to forfeit. While the defendant himself cannot contest the forfeiture in this proceeding, often others connected to the defendant (such as family members and associates) do contest the forfeiture.

b. Administrative Forfeiture

Administrative forfeiture, which is part of the civil forfeiture regime, refers to the process by which property is forfeited to the United States without filing a case in federal court. Rather, the forfeiture process occurs before a law enforcement agency that has control of the assets. The law provides many procedural safeguards, including strict time limits, to govern administrative forfeiture and protect the interests and rights of property holders. Any seizure of property subject to administrative forfeiture must be based on probable cause in accordance with the

Fourth Amendment to the U.S. Constitution. Real property cannot be administratively forfeited, nor can personal property worth more than $500,000 unless certain limited, statutory exceptions apply, such as if the personal property is a conveyance used to import a controlled substance.

Following seizure, the government is required to send direct written notice of the administrative forfeiture proceeding to every person who appears to have an interest in the seized property and whose identity is known to the government. To ensure notice to interested persons whose identities are not known to the government, the government publishes notice of the administrative forfeiture proceeding on a dedicated website www.forfeiture.gov. If anyone files a claim with the administrative agency contesting the forfeiture, the agency refers the case to a United States Attorney's Office, which then has to decide whether to proceed with a judicial forfeiture action or to return the property. If no claim is filed, the administrative forfeiture still is not finalized until it has been reviewed for legal sufficiency by agency counsel.

c. Civil Forfeiture

Civil judicial forfeiture is an *in rem* proceeding brought against property that was derived from or used to commit an offense, rather than against a person who committed an offense. Unlike criminal forfeiture, no criminal conviction is required, although the government is still required to prove, in federal court, that the property was linked to criminal activity.

The *in rem* form of the action allows the court to gather anyone with an interest in the property in the same case and resolve all the issues with the property at one time. In a civil forfeiture case, the government is the plaintiff, the property is the defendant, and any person who claims an interest in the property is a claimant. The civil forfeiture action proceeds like a normal civil action, except for some special rules that apply only to forfeiture cases, set forth in the Federal Rules of Civil Procedure.

In fact, civil forfeiture can be an important sanction and deterrent for criminal activity if the government determines the appropriate outcome for the crime is monetary alone as opposed to a criminal conviction, which carries potential imprisonment as well as larger monetary penalties in the form of both forfeiture and punitive fines. This is often the case with structuring violations, which if prosecuted criminally are punishable by up to five years in prison, combined with forfeiture of the structured funds and criminal fines. Where the government seeks to ensure an individual or business does not continue evading the reporting requirements, but at the same time, wishes to avoid the additional consequences inherent in a felony conviction, the ability to civilly forfeit a portion of the structured funds represents an important middle ground in the government's enforcement efforts.

i. Why Use Civil Forfeiture?

The Department would like to highlight certain circumstances and categories of cases that would not be possible without civil forfeiture.

Property in the possession of a third party:

- Either by design or accident, criminally-tainted property is often in the possession of someone other than the person who committed the crime. The most sophisticated

criminals frequently hide assets in the possession of third parties, like family members or trusted confederates. In such cases, civil forfeiture enables the government to recover property when criminal prosecution of the possessor of the property may not be appropriate or feasible.

As Justice Kennedy observed of statutes authorizing civil forfeiture, "[these] statutes are not directed at those who carry out the crimes, but at owners who are culpable for the criminal misuse of the property. The theory is that the property, whether or not illegal or dangerous in nature, is hazardous in the hands of this owner because either he uses it to commit crimes, or allows others to do so. The owner can be held accountable for the misuse of the property." *United States v. Ursery*, 518 U.S. 267, 294 (1996) (concurring opinion; internal citation omitted).

Criminals located outside the United States who cannot be prosecuted while outside our jurisdiction:

- **Terrorists** — In the *Bridge Investments* case, the government is seeking to forfeit a $6.5 million investment account owned by an al Qaeda operative who is located outside the United States.

- **Kleptocrats** — In the *Obiang* case, the government secured the forfeiture of $10.3 million in corruption proceeds from a sitting Vice President of Equatorial Guinea, Teodoro Nguema Obiang Mangue, as well as an additional $20 million to be given to a charitable organization for the benefit of the people of Equatorial Guinea.

- **Fugitives** — In the *Benitez* case, involving a $110 million Medicare fraud orchestrated by three brothers, the brothers escaped to Cuba, where they remain fugitives. Two civil forfeiture actions resulted in the recovery and civil forfeiture of millions of dollars of property, including a hotel, a water park, 30 vehicles, a car rental agency, houses, condos, and apartments.

  The internet has opened new avenues for international organized criminals to commit crimes in the United States without leaving foreign countries that are safe havens from extradition. Civil forfeiture can be the only tool to secure their ill-gotten gains and return them to victims, or otherwise to deter and punish such conduct.

Criminal defendant is deceased:

- In the *Enron* case, Kenneth Lay died after he was convicted by a jury but before he could be sentenced. Civil forfeiture was the only way to secure millions of dollars of Lay's assets, which were then used to compensate victims of the Enron fraud.

Living or perishable property:

- In the case of Michael Vick, the government was able to use civil forfeiture to move quickly to protect the abused dogs, rather than waiting for the criminal case to be fully resolved. The United States civilly forfeited 52 pit bulls, many of which were then adopted.

Impossible to identify a defendant:

- Stolen art and other items of cultural significance often appear in an auction house with no clear path to the person or group that originally stole the artifact. There are many such examples, including in the *Argentinean Sauropod* case involving three rare dinosaur eggs stolen from Argentina and brought to the United States. Despite being unable to identify the smugglers, the U.S. government was able to civilly forfeit the stolen eggs and return them to Argentina.

ii Assisting Victims of Crime

Not only does asset forfeiture punish criminals by removing their tools and illicit proceeds, it also enables the government to compensate the victims of crime. In fact, asset forfeiture laws, including civil asset forfeiture laws, are frequently the most effective tool in recovering the proceeds and property of crime for victims. Since 2000, the Department has returned over $4.1 billion in assets to the victims of crime through asset forfeiture, of which $1.8 billion was recovered through civil forfeiture. In addition, the Department expects to distribute approximately $4 billion civilly forfeited as a result of the Madoff investigation and related forfeiture proceedings involving the estate of Madoff's partner Jeffry Picower in 2010, JP Morgan Chase Bank in 2014, and other actions tied to the Madoff fraud scheme. Once the process needed to resolve more than 60,000 Madoff claims is complete, the total amount of victim compensation provided through forfeiture will stand at more than $8 billion. At that point, victim compensation from forfeited funds will far exceed the nearly $5.9 billion of forfeited funds that have been shared by the Department with state and local law enforcement partners to fight crime as part of the Equitable Sharing Program.

There are two primary reasons why forfeiture is sometimes the only way to assist victims:

First, civil forfeiture laws allow for seizure, after a judicial finding of probable cause that the seized property represents the proceeds of crime, or a court order to preserve assets pending a final resolution of the forfeiture case. Criminal defendants rarely have any illicit proceeds available by the time they are convicted and sentenced, when the court will order restitution. In the pre-conviction phase, civil asset forfeiture tools provide what is often the only means of preserving property subject to forfeiture so that it can ultimately be returned to the victims of the crime.

Second, over the years, the U.S. Marshals Service has developed a very efficient forfeiture management regime to maintain and eventually sell forfeited property. In cases where there are victims of the offense giving rise to forfeiture, this results in a much higher return for those victims.

2. Civil Forfeiture Proceedings in Structuring Cases

Congress has authorized forfeiture of funds used in a § 5324 structuring violation under 31 U.S.C. § 5317(c). Subsection (c)(1) authorizes criminal seizure and forfeiture of "all property, real or personal, involved in the offense and any property traceable thereto" for any violation or conspiracy to commit any violation of § 5324; subsection (c)(2) authorizes civil seizure and forfeiture of any property "involved in" or "traceable to" a violation of § 5324. For

the government to seize funds under either provision, the government must show probable cause that the funds were involved in or traceable to the structuring offense.

Moreover, civil seizures under § 5317(c)(2) require the intervention and approval of a court. Structuring seizures must be made "in accordance with the procedures governing civil forfeitures in money laundering cases pursuant to [18 U.S.C. § 981(a)(1)(A)]." 31 U.S.C. § 5317(c)(2). The seizure or restraint of property under 18 U.S.C. § 981(a)(1)(A) is governed by 18 U.S.C. § 981(b), which requires the government to seize property "pursuant to a warrant obtained in the same manner as provided for a search warrant under the Federal Rules of Criminal Procedure." 18 U.S.C. § 981(b)(2). A court will only issue a search warrant upon a showing of probable cause by the government. Fed. R. Crim. P. 41(d)(1). Before the government can seize any structured funds, it must make a showing to the court that there is probable cause to believe the funds were structured in a manner intended to avoid a reporting requirement. Thus, the government is required to prove, and a court to find, probable cause before any seizure based on structuring. And probable cause is the very same legal standard required to obtain a search warrant or an arrest warrant.

3. Protections for Individuals Who Wish to Contest a Seizure or Forfeiture

In a civil action to forfeit property linked to crime, including a structuring violation, the government has the burden of proving by a preponderance of the evidence that a crime occurred, and that the seized property was connected to that crime. If the government is seeking to forfeit the proceeds of a structuring offense, it must establish that the property was obtained directly or indirectly as a result of the commission of the offense giving rise to forfeiture, and any property traceable thereto. 18 U.S.C. § 981(a)(2)(A). If the government is seeking forfeiture based on a theory that the property facilitated or was "involved in" crime, it must establish that there was a substantial connection between the property and the structuring. 18 U.S.C. § 983(c)(3).

Even if the government meets its burden of establishing the nexus between the property and the offense that forms the basis for the forfeiture, that does not necessarily end the inquiry. The law entitles any individuals with standing to assert a claim that they are innocent owners of the property at issue, after the government has proven its case. 18 U.S.C. § 983(d)(1). There are two types of innocent owner defenses: one applicable to persons who owned the property when the illegal activity was occurring, and the other applicable to persons who acquired their interest in the property after the illegal conduct occurred.

Congress provided two ways in which persons who owned an interest in the property when the illegal activity was occurring can prevail on an innocent owner defense. By a preponderance of the evidence, they can show they did not know of the illegal conduct Or, if they did know, they can show that upon learning of the conduct they did all that reasonably could be expected, under the circumstances, to terminate the illegal use of the property, including giving timely notice of the conduct to law enforcement and revoking, or making a good faith attempt to revoke, permission of those engaged in the illegal conduct to continue using the property or taking other reasonable steps to discourage or prevent such illegal use. 18 U.S.C. § 983(d)(2).

Persons who acquired an interest in the defendant property after the illegal conduct occurred must show that they qualify as a bona fide purchaser for value of the interest and that,

at the time they acquired the interest, they did not know and were reasonably without cause to believe that the property was subject to forfeiture. 18 U.S.C. § 983(d)(3). The innocent owner defense is unavailable as to property that qualifies as contraband or other property that is illegal to possess. 18 U.S.C. § 983(d)(4).

Further, as part of the comprehensive reforms included in the Civil Asset Forfeiture Reform Act of 2000 (CAFRA), a claimant in a civil forfeiture case may be entitled to counsel or attorneys' fees and costs. A claimant is entitled to appointed counsel if the claimant already has appointed counsel in a related criminal proceeding, or if the defendant property is the primary residence and the claimant is financially unable to obtain representation (18 U.S.C. § 983(b)(1) and (2)). CAFRA also provides that when a claimant substantially prevails in a civil forfeiture action, to the government is liable for his or her attorneys' fees and litigation costs. 28 U.S.C. § 2465(b).

I. Department of Justice Review of the Asset Forfeiture Program and Issuance of New Structuring Policy

As evidence of its commitment to improving the Asset Forfeiture Program, over the past 18 months the Department has been engaged in a comprehensive review of forfeiture practices and policies. The goal of this review is to ensure that the Department is allocating its resources to address the most serious criminal threats and that federal asset forfeiture authorities are appropriately and effectively used in that effort, consistent with civil liberties and the rule of law.

On March 31, 2015, the Department issued a policy limiting the use of asset forfeiture authorities in connection with structuring offenses under 31 U.S.C. § 5324(a). That policy restricts the use of civil or criminal forfeiture for structuring offenses until after a defendant has been criminally charged. Under the new policy, in the absence of criminal charges, judicially authorized warrants to seize structured funds can only be sought in two ways. Under the first method, the prosecutor must develop probable cause of additional federal criminal activity and that determination must be approved by a supervisor. Otherwise, a prosecutor may ask a judge to issue a seizure warrant in structuring cases only if either the U.S. Attorney or the Chief of the Criminal Division's Asset Forfeiture and Money Laundering Section (AFMLS) personally determines that seizure would serve a compelling law enforcement interest.

The new policy also imposes important protections after a seizure has taken place. The policy requires that, if a prosecutor determines that there is insufficient admissible evidence to prevail in a criminal or civil trial, within seven days the prosecutor must direct a seizing agency to return the funds. The policy also imposes a 150-day deadline to file a criminal indictment or civil complaint against the funds seized, or otherwise directs a return of the full amount of the seized funds. In addition, the policy requires a formal, written settlement agreement vetted by a federal prosecutor for settlements of structuring offenses. As explained at its implementation, the policy applied prospectively only and was "intended to ensure that [the Department's] investigative resources are appropriately and effectively allocated to address the most serious structuring offenses, consistent with Departmental priorities." The policy serves to guide the exercise of investigative and prosecutorial discretion in future cases.

The Department's review of asset forfeiture is still ongoing. Other reforms include the January 2015 Attorney General Order prohibiting the adoptive forfeiture of property seized by

state and local law enforcement, except in cases implicating public safety. More recently, in March 2016, the Department issued a Policy Directive requiring additional approvals when civilly forfeiting property used to facilitate a crime to ensure that the rights of property owners are appropriately balanced with compelling law enforcement interests. We believe these carefully crafted changes have significantly improved the program, and should leave little doubt that, where appropriate, the Department will address concerns.

II. Petitions for Remission and Mitigation

After a forfeiture is complete, owners, lienholders, or victims can seek the return of property by filing a petition for remission or mitigation. This process "does not serve to contest the forfeiture, but rather is a request for an executive pardon of the property based on the petitioner's innocence or, for a wrongdoer, on a plea for leniency." *United States v. Ruth*, 65 F.3d 599, 604 n.2 (7th Cir. 1995). The Department has procedures in place for considering and fairly resolving petitions for remission and mitigation of completed forfeitures. The Department designed regulations to offer owners and lienholders a way to pursue their interests in forfeited property without requiring them to litigate those interests in court. These regulations also provide a mechanism for victims of the crimes underlying a forfeiture to seek recovery for certain losses.

The regulations, codified at 28 C.F.R. § 9, require that when the Department or one of its law enforcement agencies initiates an administrative or judicial forfeiture action, it must send a notice of seizure and intent to forfeit seized property to persons who have a recognized ownership interest in seized property, such as title owners and lienholders. The regulations require that the notice provide, among other things, information describing the remission process, such as when and where a petitioner may submit a petition for remission or mitigation.

The Department rules on petitions for remission once a forfeiture is completed. The seizing agency decides petitions in administrative forfeitures, and AFMLS decides petitions in judicial forfeitures. Where the Department decides petitions for remission, it does so in accordance with its remission regulations. As part of reviewing any remission or mitigation petition, under 28 C.F.R. § 9.5(a)(4), the official ruling on the petition must "presume a valid forfeiture and shall not consider whether the evidence is sufficient to support the forfeiture." In order to qualify for remission, the owner or lienholder must establish that he or she "has a valid, good faith, and legally cognizable interest in the seized property as owner or lienholder as defined in this part and is an innocent owner within the meaning of 18 U.S.C. §§ 983(d)(2)(A) or 983(d)(3)(A)." 28 C.F.R. § 9.5(a). Given these criteria, individuals who are seeking return of funds forfeited in structuring cases may not qualify for remission.

However, when a petitioner does not otherwise qualify for remission, the Department may decide whether mitigation would be appropriate under its specific mitigation regulations. Where a petitioner seeks mitigation but was involved in the commission of the offense underlying forfeiture, those regulations provide as follows:

> The ruling official may in his or her discretion grant mitigation to a party involved in the commission of the offense underlying the forfeiture where certain mitigating factors exist, including, but not limited to: the lack of a prior record or evidence of similar criminal conduct; if the violation does not include drug

> distribution, manufacturing, or importation, the fact that the violator has taken steps, such as drug treatment, to prevent further criminal conduct; the fact that the violation was minimal and was not part of a larger criminal scheme; the fact that the violator has cooperated with federal, state, or local investigations relating to the criminal conduct underlying the forfeiture; or the fact that complete forfeiture of an asset is not necessary to achieve the legitimate purposes of forfeiture.

28 C.F.R. § 9.5(b)(2).

Throughout our process of reviewing petitions for remission and mitigation, the Department is focused on ensuring fairness and consistency, as well as instilling public confidence in these and other cases. Although we cannot comment on any pending litigation or specific cases, the Department continues to thoroughly review and appropriately rule on any current and newly filed petitions for remission or mitigation, including those involving structuring violations.

Conclusion

With respect to the specific topic of civil forfeiture of property involved in the crime of structuring, the policy adopted over a year ago has already effectively eliminated such forfeiture actions unless the defendant is first criminally charged or prosecutor can establish the presence of additional criminal activity separate from the crime of structuring. This is a significant change that exceeds the requirements of the law, and it underscores the Department of Justice's commitment to fighting crime and returning money to victims while protecting civil liberties and ensuring due process. The Department looks forward to working with the Congress to identify other ways to improve the Asset Forfeiture Program and our enforcement of structuring violations in a manner consistent with these ideals. I thank the Subcommittee for its interest in these critical issues, and am happy to answer any questions.