

Investigations, Compliance, and Defense

The White House and DOJ Announce the Creation of Two New Task Forces to Fight Corruption and Combat Human Smuggling and Trafficking in Central America

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Recently, the Biden Administration has taken significant steps to ramp up anti-corruption and other law enforcement efforts in Central America. On June 7, 2021, the White House and Department of Justice (DOJ) [announced](#) the launch of two new, multi-agency task forces dedicated to fighting corruption and combatting human smuggling and trafficking in Mexico and the Northern Triangle, which consists of El Salvador, Guatemala, and Honduras. The announcement followed shortly after President Biden's [June 3 declaration](#) that the fight against corruption is a core US national security interest. In light of these enforcement developments, multinational companies, particularly those with operations in Mexico and the Northern Triangle, should take proactive steps to assess key risk areas and ensure adequate compliance measures are in place.

The White House announced plans to create a new anti-corruption task force focused on Central America following Vice President Kamala Harris's bilateral meeting with the President of Guatemala on a trip that also included a stop in Mexico. The announcement states that DOJ, with support from the State Department, will establish an anti-corruption task force to investigate and prosecute corruption cases connected to the United States, Guatemala, and the region. The task force will include US prosecutors and law enforcement experts and will involve three components:

1. Increased focus of the global Kleptocracy Initiative to prosecute corruption cases and seize illicitly gained assets arising from corruption in Guatemala, El Salvador, and Honduras;
2. Expansion of the number of Resident Legal Advisors to provide capacity-building, training, and case-based mentoring to the Guatemalan Public Ministry, including the Special Prosecutor Against Impunity (FECI), to build corruption cases; and
3. Rapid response capability to deploy US prosecutors and law enforcement experts to provide mentorship to develop corruption cases.

On the same day, the White House and DOJ also [announced](#) the creation of another task force, "Joint Task Force Alpha," which will seek to identify, disrupt, and prevent migrant smuggling and human trafficking operations, and serve as a complement to the Department's anti-corruption efforts. The task force, which is being established in partnership with the Department of Homeland Security (DHS), will include federal prosecutors from Arizona, California, and Texas, as well as personnel from DHS, the Federal Bureau of Investigation (FBI), and the Drug Enforcement Administration (DEA). In its press release, DOJ specifically noted that Joint Task Force Alpha will complement its efforts to fight corruption in the region. Specifically, DOJ stated that it intends to increase its focus on investigations, prosecutions, and asset recoveries relating to corruption in Northern Triangle countries through its Foreign Corrupt Practices Act enforcement program, counter-narcotics prosecutions, and Kleptocracy Asset Recovery Initiative.

In addition, DOJ announced that its Office of Prosecutorial Development, Assistance, and Training (OPDAT) and International Criminal Investigative Training Assistance Program (ICITAP) personnel—including new anti-corruption legal advisors in the Northern Triangle—will work with regional prosecutors and investigators to build corruption cases in the region and develop leads for the Kleptocracy Asset Recovery Initiative. Joint Task Force Alpha will supplement other law enforcement efforts focused on the region, including the FBI's Miami-based international corruption squad, which

was set up in 2019 and has investigated corruption and money laundering involving Latin America.

Both task forces are aligned with the recently enacted [United States-Northern Triangle Enhanced Engagement Act](#), which required the Department of State to assemble a list of “corrupt and undemocratic actors” in the Northern Triangle. In accordance with that law, on July 1, 2021, the Department of State released a [list](#) identifying 55 such individuals,^[1] including current and former high-ranking government officials, who are now generally ineligible for visas and admission to the United States. The list includes two former presidents, a former first lady, ministers, current and former members of congress, and Supreme Court judges, among other high-ranking government officials from the region.

Alongside these steps taken by the US government, civil society and transparency organizations based in Central America launched a joint regional anti-corruption body on June 3, 2021 covering Guatemala, Honduras, and El Salvador. The mission of the recently created Center Against Corruption and Impunity in Northern Central America (*Centro Contra la Corrupción y la Impunidad en el Norte de Centroamérica*) (CCINOC) is to fight against corruption and impunity in the region. The center will seek to carry out investigations as well as propose legal or administrative reforms.

Viewed as a whole, these initiatives demonstrate a growing focus by the US government and regional actors on rooting out corruption in Central America. As a result, companies with operations in the region should take proactive steps to evaluate key risk areas and strengthen their compliance programs. For example, companies may want to consider conducting risk assessments in both English and Spanish in the region, particularly with respect to their use of third-party contractors and suppliers. In addition, when reviewing, updating, and enhancing already existing compliance programs, companies should ensure that they have robust anti-corruption policies and procedures in place given the Biden Administration’s focus on this risk area.



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[1] Of the individuals listed, 14 are from El Salvador, 20 from Guatemala, and 21 from Honduras.

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