

Annual Report Office of Professional Responsibility (OPR)

OPR Overview

Highlights of OPR Activity Fiscal Year 2019

Employee Misconduct and Corruption Statistics Fiscal Year 2019



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Message from the Assistant Commissioner, Office of Professional Responsibility (OPR)



Matthew Klein Assistant Commissioner Office of Professional Responsibility

As the United States' frontline unified border agency, U.S. Customs and Border Protection (CBP) takes a comprehensive approach to border management and control; combining customs, immigration, border security, and agricultural protection into one coordinated activity. Operating in such a complex threat environment requires tremendous focus and a commitment to the highest standards of professionalism and integrity.

Employee conduct, both on and off duty, forms the basis of public trust. The American people have entrusted us to protect the homeland and defend liberty. Guided by the highest ethical and moral principles, and exhibiting the highest level of professional responsibility, CBP employees strive each and every day to maintain the public trust and engender the confidence of the communities we serve and protect. However, like all border agencies in the world, CBP remains vulnerable to the potential for corruption and misconduct within its workforce.

It is the duty of the Office of Professional Responsibility (OPR) to identify, mitigate, and counter these threats or vulnerabilities which may undermine CBP's workforce integrity

and security. OPR relies heavily on teamwork, unity of effort, and - most importantly - its dedicated and talented people each day.

To highlight the success of our workforce, and continue our own commitment to transparency and responsiveness, we release the following Annual Report for Fiscal Year (FY) 2019. This year's Annual Report highlights OPR's investigative activities, statistics on CBP employee misconduct and corruption, and key OPR accomplishments throughout the fiscal year. The purpose of this report is to illustrate OPR's diverse scope of work and demonstrate its value to safeguard and promote the integrity and security of the entire CBP workforce.

In FY 2019 OPR realized improvements and created significant impact in support of CBP's mission priorities in the following areas:

- Published the first OPR Strategic Plan (2019-2023) and cascaded strategic objectives into six Division Strategic Plans for implementation.
- Established new Investigative Operations Division (OPR-IOD) offices in San Juan, Puerto Rico, and Bangor, Maine, to more efficiently and effectively conduct internal investigations. Additionally, internally supported the funding of 30 new criminal investigator positions within OPR-IOD.
- Prioritized outreach and communication with Non-Government Organizations and other migrant rights groups in a concerted effort to build trust and promote the immediate reporting of alleged mistreatment and abuse of detainees in CBP's custody or care.
- Positively contributed to meeting FY 2019 frontline hiring goals by prioritizing polygraph examinations and the initiation and adjudication of applicant background investigations for suitability and eligibility. Completed the piloting of the Prescreening Interview (PSI) designed to cull out unsuitable applicants earlier in the hiring process. The completion of the pilot resulted in the approval to fully implement the PSI in FY 2020.
- Passed the biennial National Center for Credibility Assessment Quality Assurance 143 point polygraph inspection with no findings.

I am honored to work with and lead such an advanced and mission-focused team. I remain proud of the work OPR employees do every day to put workforce accountability and organizational transparency at the forefront of their efforts. Throughout the fiscal year we have been innovative, agile, and collaborative. It is our responsibility, and promise, to continue to seek improvements and efficiencies in monitoring, evaluating, identifying, and countering threats or vulnerabilities that could undermine CBP's integrity and security.

Sincerely

Matthew Klein Assistant Commissioner

Office of Professional Responsibility

OPR Overview

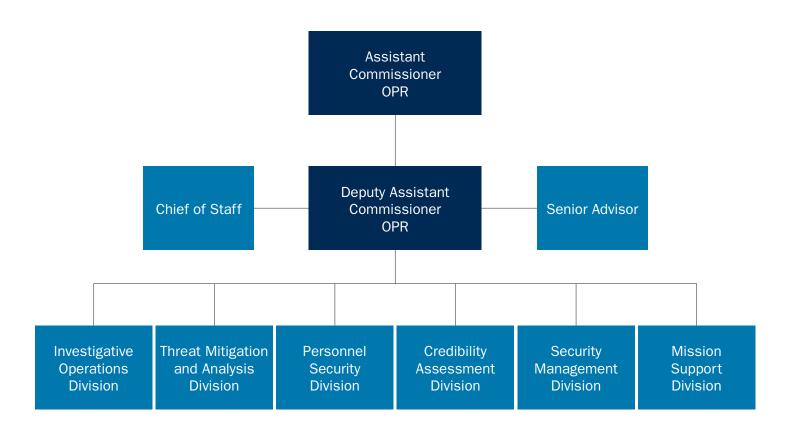
Officially established by the *Trade Facilitation and Trade Enforcement Act of 2015*, and subsequently codified under 6 United States Code 211(i), OPR promotes compliance with agency-wide programs and policies related to corruption, misconduct, and mismanagement, and executes CBP's internal security and integrity awareness programs. OPR is a stand-alone office led by an Assistant Commissioner (AC), who reports directly to the Commissioner of CBP. The AC OPR has executive oversight of *CBP's Integrity and Personal Accountability Strategy* and the agency's efforts to prevent, detect, and investigate employee misconduct and corruption. The AC also serves as CBP's Chief Security Officer, responsible for ensuring the safety and security of CBP's assets and personnel.

Vision

With professionalism, accountability and vigilance, we will serve as the premier organization for identifying, mitigating and countering threats and vulnerabilities which undermine CBP's workforce integrity and security.

Organization

The OPR mission transcends the traditional investigative functions of most law enforcement internal affairs units and the organizational structure reflects our unique dual mission to safeguard and promote both the integrity and security of CBP.



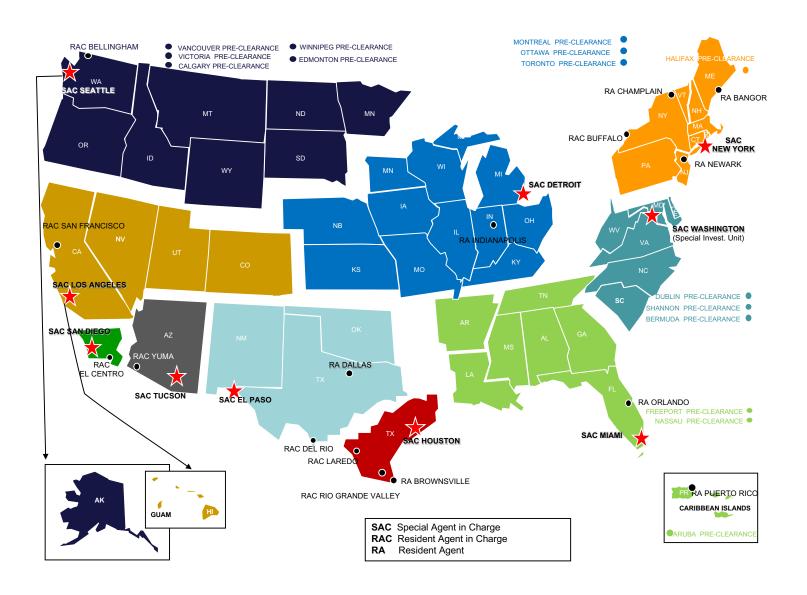
OPR Divisions

The OPR workforce consists of six divisions and the Executive Office of the Assistant Commissioner and includes criminal investigators, polygraph examiners, personnel security, information security, as well as physical security specialists, analysts, and mission support specialists.

Investigative Operations

The Investigative Operations Division (OPR-IOD) is the internal investigative arm of CBP and conducts both criminal and administrative misconduct investigations. OPR-IOD is organizationally structured to meet the threat of corruption and address misconduct that undermines the safety and security of CBP's workforce and mission.

OPR-IOD personnel are strategically assigned throughout the United States in ten OPR field offices each led by a Special Agent in Charge (SAC): Seattle, Los Angeles, San Diego, Tucson, El Paso, Houston, Detroit, Miami, New York, and Washington, DC. OPR-IOD criminal investigators collaborate with the Department of Homeland Security (DHS) Office of Inspector General (OIG) and the Federal Bureau of Investigation (FBI)-led Border Corruption Task Force (BCTF)/Public Corruption Task Force (PCTF) to safeguard the integrity of the CBP workforce. Seven specialized units managed in Headquarters support investigations: Technical Operations Unit, Cyber Investigations Unit, Use of Force Incident Team, Administrative Inquiry Program, Investigative Review Team, Policy Team, and the Integrity Assurance Program.



Threat Mitigation and Analysis

The Threat Mitigation and Analysis Division (OPR-TMAD) is home to OPR's internal analytical cadre. On behalf of OPR's divisions, as well as CBP-partner agencies, OPR-TMAD personnel research and analyze complex data and information surrounding individuals and/or misconduct allegations using a variety of law enforcement resources and private sector tools.

Personnel Security

The Personnel Security Division (OPR-PSD) is responsible for the development of policy and procedures and the implementation and administration of all aspects of the Personnel Security program at CBP to include background investigations, periodic reinvestigations, security clearances, employment suitability determinations and continuous evaluation of employees to ensure eligibility for employment. CBP has been delegated authority by the Office of Personnel Management (OPM) to perform its own background investigations of applicants, employees and contractors employed by or seeking employment with CBP. OPR-PSD directs, coordinates, and ensures compliance with all required standards of background investigations conducted by our contracted Investigative Service Providers.

Credibility Assessment

The Credibility Assessment Division (OPR-CAD) enhances the integrity of the CBP workforce and deters insider threats by providing OPR with essential information through administration of polygraph examinations that advance or resolve pre-employment background, administrative, criminal, and counterintelligence investigations. The Anti-Border Corruption Act of 2010 (ABCA) mandates that all applicants for CBP law enforcement positions undergo a pre-employment polygraph examination as part of the screening process. OPR-CAD administers all of CBP's pre-employment polygraph examinations from 26 offices and other satellite offices across the continental U.S. in support of the hiring process.

Security Management

The Security Management Division (OPR-SMD) safeguards CBP's workforce and operations by providing oversight for physical, informational, industrial, and operational security programs in CBP. OPR-SMD identifies and reduces risks, threats, and vulnerabilities in the security of CBP's personnel and assets, while working to support its mission of protecting the Nation's borders.

Mission Support

The Mission Support Division (OPR-MSD) develops and executes administrative support strategies that enable OPR to perform its function by improving effectiveness, efficiency, customer service, and communication in the following areas: financial and administrative support services, facilities, fleet, and property management, and coordination of training and work/life programs.

Highlights of OPR Activity Fiscal Year 2019

Investigations

OPR-IOD investigators completed a total of **1,595** investigations in FY 2019, a 26% increase from the 1,267 investigations completed in FY 2018.

- Conducted multiple comprehensive inspections of Southwest Border facilities, which encompassed approximately 30% of the southern border sectors, in response to emergent issues related to the safety of human life. These inspections encompassed **29** U.S. Border Patrol stations, four processing centers, three forward operating bases, and six checkpoints in the Rio Grande Valley, El Paso, and Yuma Sectors.
- Responded to 956 call outs related to use of force and critical incidents in support of investigative operations.
- Completed 73 Administrative Inquiries involving non-criminal employee misconduct and conducted three training sessions for 68 new component fact finders.

Use of Force Incident Team (UFIT) Response

In FY 2019, OPR opened and assigned for investigation **449** use of force incidents involving **627** individual applications of force¹.

- 11 of the 449 use of force incidents opened by the UFIT in FY 2019 involved the use of deadly force or resulted in serious injury or death. These incidents occurred in five states, and the majority occurred in Texas, Arizona, and California.
- 438 of the 449 use of force incidents opened by the UFIT in FY 2019 involved less-lethal uses of force and did not result in serious injury or death. The incidents took place in 12 states, and the majority occurred in Texas, Arizona, and California.

Analysis

- OPR-TMAD investigative analysts completed a total of 2,190 analytical actions in FY 2019. OPR-TMAD investigative analysts continued to increase research and analysis capabilities in FY 2019.
- OPR-TMAD increased the identification and mitigation of threats by 9%.
- Research success is highlighted by 222 formal analytical products, 1,121 internal responses, and 31 partner responses.
- OPR-TMAD utilized 71 suspected misconduct alert memoranda, 197 data request responses, and
 57 analytical actions that resulted in referrals for investigation.

Personnel Security

Throughout FY 2019, OPR-PSD developed and implemented programs to increase the efficiency and effectiveness of applicant, employee, and contractor vetting.

- Utilized a robust Continuous Evaluation Program to continuously monitor criminal and suspicious activity
 of those CBP employees deemed eligible for access to classified information or hold a Sensitive/National
 Security position.
- Worked with counterparts across CBP and DHS to leverage existing technology to more efficiently vet applicants, employees, and contractors during the background investigation process and continuous evaluation.
- Participated in DHS collaborative efforts including the DHS Personnel Security Operations Task Force, which identified ways to improve the overall personnel security posture by evaluating personnel security processes and procedures at the DHS Acquisition Innovative Roundtable.
- Aided Operation Guardian Support by vetting National Guard personnel and DHS Volunteer Surge Force medical and support staff contracted to support CBP operations on the Southwest Border.
- Supported DHS' Countering Weapons of Mass Destruction Office by vetting Emergency Medical Technicians to provide screening for Ebola virus symptoms at airports within the United States.

¹ Types of Force are as follows: Electronic Control Weapon (ECW; aka Taser), Collapsible Straight Baton (CSB), Oleoresin Capsicum (OC; aka pepper spray), Pepper ball Launching System (PLS), FN-303 (less lethal projectiles), K-9 bites (use of a CBP patrol canine to physically apprehend a subject), Warning shots (only authorized for Air and Marine Operations), Firearm discharges (any intentional discharge of a CBP owned firearm), and Other (includes Controlled Tire Deflation Device, Unintentional Discharge of a CBP firearm, Animal Euthanasia, Tear Gas (CS), and flashlight used as a weapon).

Personnel Security Activity

ACTIVITY	FY 2018	FY 2019
Cases processed through Intake	58,905 cases including: • 40,641 initial background investigations • 18,264 periodic reinvestigations	 51,349 cases including: 39,033 initial background investigations 12,316 periodic reinvestigations
Adjudicative determinations on the suitability and fitness for employment and/or eligibility to occupy a national security position	Applicants: 12,756 Employees: 12,050	Applicants: 15,334 Employees: 10,973
Security clearance reviews for eligibility for access to classified information	1,309	1,607
Reviews of investigations and adjudications and site inspections as part of the Quality Assurance Program	7,100 quality assurance reviews 11 site inspections	7,109 quality assurance reviews 10 site inspections
Responses to FOIA requests related to OPR activities	759	954
Continuous Evaluation Cases	4,599 cases opened7 referrals to OPR-IOD for investigative purposes	1,750 cases opened15 referrals to OPR-IOD for investigative purposes

Credibility Assessment

In FY 2019, OPR-CAD completed pre-employment polygraph examinations for over **14,500** Law Enforcement position applicants.

- OPR-CAD tested over 1,300 applicants per month in FY 2019. The increase in applicant testing compared to FY 2018 contributed to an 88% class seat utilization for Border Patrol Agents, 93% class seat utilization for Customs and Border Protection Officers, and 100% class seat utilization for the Air and Marine Academy in FY 2019.
- Partnered with Office of Human Resources Management, National Frontline Recruiting Command and the Office of Public Affairs to provide transparent messaging to current and prospective employees about CBP's polygraph program. Efforts included the creation of an informational video released on YouTube and CBP.gov focusing on the positive experience and "what to expect" during polygraph examinations for applicants, updated frequently asked questions (FAQs) available on CBP.gov, and continued sharing of the program's Significant Admissions Report to CBP executive leadership.
- Conducted analysis of CBP's polygraph program to ensure timely submission of the Congressional Report on the Effectiveness of Pre-Employment Polygraph Examinations in CBP. The report revealed CBP's polygraph program is invaluable in ensuring the integrity of the agency, as evidenced by 22% of applicants providing information during the polygraph that immediately disqualified them from the hiring process.

Security Management

In FY 2019, OPR-SMD implemented several key initiatives to improve the security of CBP's personnel, information, facilities, and operations.

- Continued to develop appropriate courses of action through calculated emergency response planning and development. Future exercises will test CBP's ability to coordinate with other agencies to include local law enforcement agencies, the Federal Protective Service, the U.S. Agency for International Development, and the U.S. Environmental Protection Agency.
- Implemented the CBP Law Enforcement Officers Safety Act (LEOSA) Program, which exempts qualified retired Law Enforcement Officers (LEOs) from most state and local laws prohibiting carrying concealed firearms if in possession of both LEOSA photographic identification and required state firearms certification. In FY 2019 CBP received and vetted 265 LEOSA applications and issued over 140 photographic identifications cards to qualified retired LEOs.
- Tracked a significant reduction in security incidents involving the mishandling of classified or sensitive information since FY 2017, seeing a **50**% decrease in the number of CBP incidents. This reduction can be attributed to several factors, including security outreach efforts, targeted training programs, and improved awareness of requirements toward safeguarding classified and sensitive information across CBP.

ACTIVITY	FY 2019
PIV Cards Issuance	Over 34,500 new cards issued or re-issued
Badges and Credentials Support	Processed over 8,000 requests for Promotions, Transfers in Position, and Retirements Processed over 3,000 CBP graduates across 89 Federal Law Enforcement Training Center classes
CBP Facility Risk Assessments	Conducted 235 assessments to assure compliance of Interagency Security Committee mandated security standards
Classified and Sensitive Information Security Violations	39 Information Security incidents opened and investigated

Mission Support

During FY 2019, OPR-MSD provided key administrative support to OPR's operational divisions in **41** locations nationwide, including:

- **\$215** million in budget execution.
- Completed **62** procurement actions and managed **42** service, supply, and equipment contracts.
- Facilitated **158** hiring actions and established **79** start dates.

Employee Misconduct and Corruption Statistics Fiscal Year 2019

Intake: Allegations of Misconduct and Other Reported Matters

The investigative process is initiated upon receipt of an allegation of misconduct involving a CBP employee and/or contractor. Allegations may be reported to the DHS OIG, OPR-IOD Field Offices, or the Joint Intake Center (JIC).

Situated in the OPR-IOD headquarters office, the JIC serves as the centralized clearinghouse for receiving, documenting, and processing misconduct allegations involving CBP employees and contractors, as well as other reported matters. "Other reported matters" encompasses a wide range of issues including but not limited to, seizure discrepancies with no sign of tampering, arrests involving a CBP employee's family member with no nexus to the employee's position or job, lost or missing government property with no indication of employee negligence or carelessness, lost or missing personal property or effects reported pursuant to inspections or other interactions with CBP, etc. The JIC provides CBP with a centralized and uniform system for reporting and processing allegations of misconduct. The JIC staff documents, classifies, and refers allegations of misconduct to the DHS OIG for independent review and assessment. Cases that are declined by DHS OIG for investigative interest are either retained for investigation by CBP OPR or assigned back to the program office for administrative inquiry or immediate management action.

JOINT INTAKE CENTER DHS/OIG NOTIFICATION Retains "right of first File Opening and Processing in refusal" for all allegations Tracking System involving CBP employee INVESTIGATION misconduct DECLINATION CLASS 1 CBP/OPR NO YES CBP/OPR CLASS 2 CBP/OPR will participate in joint vestigations at OIG's CBP Admin request YES Inquiry or CLASS 3 CBP MANAGEMENT ACTION IN CONSULTATION w/ SERVICING LER – File Close Out IMMEDIATE MANAGEMENT ACTION

Processing Allegations of Misconduct and Other Reported Matters

When a report is received, an Intake Specialist creates a file in the Joint Integrity Case Management System (JICMS) database, classifies it according to the following criteria, and transmits it to DHS OIG for investigative interest:

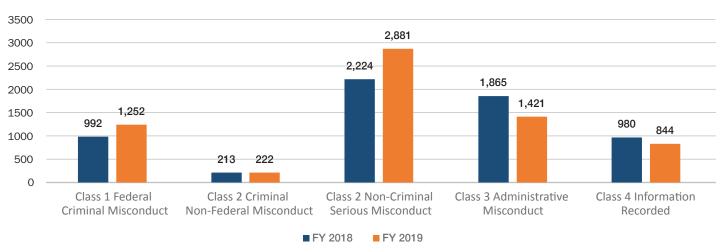
- Class 1 Criminal activity; conduct that would violate federal laws.
- Class 2 Serious misconduct; substantive misconduct and/or arrests by state/local law enforcement that could jeopardize the agency's mission including conduct that could result in a suspension of more than 14 days to removal on the first offense if substantiated.
- Class 3 Lesser administrative misconduct; allegations of misconduct referred to CBP management such as Administrative Inquiries or Management Referrals.
- Class 4 Information received, indexed, and referred as warranted.

When OPR-IOD has completed an investigation, the case is transferred to the Human Resources Management, Labor Employee Relations (HRM LER) office for adjudication by CBP management.

The JIC received **6,620** reports of alleged misconduct and other matters in FY 2019. Intake increased **5.4%** overall from FY 2018 (6,281) to FY 2019.

INTAKE BY CLASS TYPE	FY 2018	FY 2019
Class 1 – Criminal Federal Misconduct	992	1,252
Class 2 – Criminal Non-Federal Misconduct	213	222
Class 2 - Non-Criminal Serious Misconduct	2,224	2,881
Class 3 – Administrative Misconduct	1,865	1,421
Class 4 – Information Recorded	980	844

Intake by Class Type FY 2018 and FY 2019



JIC Intake by Component Office

In FY 2019, **88**% of the intake in the JIC involved employees from the Office of Field Operations (OFO) and U.S. Border Patrol (USBP).

INTAKE BY COMPONENT OFFICE	FY 2018	FY 2019
Office of Field Operations	3,242	3,394
U.S. Border Patrol	2,403	2,431
Air and Marine Operations	100	107
Enterprise Services	258	269
Office of Professional Responsibility	44	64
Office of the Commissioner	10	17
Office of Trade	18	19
Operations Support	87	64
Office of Public Affairs	5	4
Office of Chief Counsel	13	13
Office of Congressional Affairs	2	0
Unknown	97	238
TOTAL INTAKE	6,279	6,620

Arrests for Misconduct and Corruption

Employees are required to report instances in which they are arrested, cited, detained, or indicted for violations of law. For ease of discussion, these instances are collectively referred to as arrests. Despite this requirement, employees sometimes delay reporting and/or fail to report such arrests. As a result, the numbers listed here represent all reported arrests as of the date the data was queried. As arrests are reported to the JIC or identified via other investigative means, they are added to the appropriate fiscal year.

The JIC received **231** reports of arrest in FY 2019 involving **223** employees. Eight employees reported two arrests in FY 2019. Misconduct occurred primarily off-duty, but also included illegal activity while on duty. Nearly all of the arrests involved employees from OFO and USBP in FY 2019 **(89%)** as compared to all other offices combined.

REPORTED ARRESTS	FY 2018	FY 2019
USBP	148	96
OFO OFO	116	110
All Other Offices	23	25
TOTAL	287	231
Average Age	40 years	40 years
Average Time with CBP	10.7 years	10.0 years

All reported arrests of CBP employees are classified into one of 16 categories according to the nature of the offense. With the exception of Corruption, the totals in each category reflect criminal activity and subsequent arrests that took place during the respective fiscal year.

- While the arrests and indictments in the Corruption category took place in the fiscal year, they are typically the result of complex investigations of criminal activity that may span multiple fiscal years.
- In FY 2019, Drug and Alcohol Related Misconduct continued to be the most frequently reported offense comprising **50**% of all incidents. This category includes a range of violations such as driving under the influence of alcohol or public intoxication.
- Domestic and Family Misconduct (20%) is the next highest category of reported unlawful offenses. This category includes a range of violations where there is physical violence inflicted upon or a disturbance that involves an adult spouse, ex-spouse, cohabitant, domestic partner, date, or other adult family member.

Arrests Reported to the Joint Intake Center FY 2019

ARREST OFFENSE CATEGORY	FY 2018 ²	FY 2019 ³
Corruption – Illegal activity for personal gain that involved the misuse or abuse of the knowledge, access, or authority granted by virtue of official position or that violated or facilitated the violation of the laws that CBP enforces.	7	10
Assault – Any willful attempt or threat to inflict injury upon another person. Excludes domestic or sexual assault of adults and any assault of children.	9	7
Civil Rights Violations – Actions that violate the rights afforded by the U.S. Constitution, particularly civil liberties, due process, equal protection under the law, and freedom from discrimination. This includes actions on duty.	2	1
Crimes Involving Children – Any illicit activity involving a child under the age of 18 including sexual acts.	15	10
Domestic/Family Misconduct – Physical violence inflicted upon or disturbances that involve an adult spouse, ex-spouse, co-habitant, domestic partner, date, or other adult family member.	57	47
Drug/Alcohol Related Misconduct – Range of violations involving drugs and alcohol, primarily operating a vehicle under the influence of alcohol, public intoxication, and possession of controlled substances.	129	116
Impeding the Criminal Justice System – Range of actions that inhibit the practices and institutions of government directed at upholding social control and deterring and mitigating crime.	17	11
Minor Offenses – Nuisance offenses including disorderly conduct, public urination, and fighting.	1	3
Miscellaneous Misconduct – Arrests not otherwise classified.	12	2
Property Crimes – Array of criminal activity involving the destruction, damage, or theft of material property.	6	2
Sexual Misconduct – Any type of illicit activity of a sexual nature committed by or upon an adult.	7	7
Threatening Behavior – Threatening, harassing, and stalking others.	3	0
Traffic/Driving Misconduct – Violations that do not involve alcohol.	8	8
Violent Crimes – Any act which results in serious harm and/or injury to another person. Excludes all crimes against children and sexual violence against adults.	2	3
Weapons Violations – Primarily relating to firearms.	8	4
White Collar Crimes – A variety of non-violent crimes typically committed for financial gain.	4	0
TOTAL REPORTED ARRESTS	287	231

² Reported as of 8/30/2019.3 Reported as of 1/8/2020.

Corruption - Misuse or Abuse of Official Position

CBP distinguishes arrests and indictments for illegal activity involving the misuse or abuse of their official position for personal gain from those that involve conduct in an employee's personal life. Offenses involving misuse of official position are considered corruption and represent the most serious threat to the integrity of CBP. OPR conducts an in-depth assessment of each of these cases to understand the nature of the activity, how the employee used their official position to engage in criminal activity, and the reasons for violating public trust. The data points collected from each incident are aggregated to identify trends and strategic implications for improving prevention, detection, and investigative efforts.

Ten CBP employees were indicted for corruption-related activity in FY 2019.

Many corruption cases involve criminal activity that took place over time and investigations that overlapped fiscal years. These employees engaged in criminal activity including drug and alien smuggling, fraud involving immigration documents, theft of government property or money, weapons violations, and misuse of government databases. Just over half of these cases had implications for national security, as the employees engaged in criminal activity that directly impacted border security.

Two of the ten FY 2019 corruption cases have resulted in convictions or guilty pleas:

Houston, TX: A former Customs and Border Protection Officer pleaded guilty to conversion of public money. While stationed in Canada, he received monetary allowances for his residence and private school education for his children but did not pay the property management company or two private schools. He was sentenced to 5 months imprisonment, two years supervised release, and ordered to pay restitution in the amount of \$60,592.45 and a \$100 assessment.

Laredo, TX: A former Customs and Border Protection Officer pleaded guilty to two counts of false, fictitious, or fraudulent statement related to the misuse of government systems by obtaining and disclosing information to a subject under investigation. He was sentenced to six months incarceration, three years supervised release, and required to pay a \$100 assessment.



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